

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In Re:

HOUSTON REAL ESTATE
PROPERTIES, LLC,
Debtor.

Case No. 22-32998

Chapter 7

JOHN QUINLAN, OMAR KHAWAJA, AND OSAMA ABDULLATIF,
Plaintiffs,

v.

Adversary Cause No. 23-03141

JETALL COMPANIES, INC., ARABELLA PH 3201 LLC, 9201 MEMORIAL
DR. LLC, 2727 KIRBY 26L LLC, TEXAS REIT LLC, DALIO HOLDINGS
I, LLC, DALIO HOLDINGS II, LLC, HOUSTON REAL ESTATE
PROPERTIES, LLC, SHAHNAZ CHOUDHRI, ALI CHOUDHRI, SHEPHERD-
HULDY DEVELOPMENT I, LLC, SHEPHERD-HULDY DEVELOPMENT II,
LLC, GALLERIA LOOP NOTE HOLDER LLC, A. KELLY WILLIAMS,
MAGNOLIA BRIDGECO, LLC, CYPRESS BRIDGECO, LLC, MOUNTAIN
BUSINESS CENTER, LLC, RANDY WILLIAMS CH7 TRUSTEE, OTISCO
RDX LLC, MCITBE, LLC, JETALL/CROIX PROPERTIES LP, AND
JETALL/CROIX GP, LLC,
Defendants.

EXHIBIT
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2 to 5

<p>Page 2</p> <p>1 IN THE UNITED STATES BANKRUPTCY COURT</p> <p>2 FOR THE SOUTHERN DISTRICT OF TEXAS</p> <p>3 HOUSTON DIVISION</p> <p>4</p> <p>5 VIDEOTAPED DEPOSITION OF</p> <p>6</p> <p>7 OMAR KHAWAJA</p> <p>8 VOLUME I</p> <p>9</p> <p>10 TAKEN ON</p> <p>11 THURSDAY, OCTOBER 3, 2024</p> <p>12 11:03 A.M.</p> <p>13</p> <p>14 515 RUSK STREET</p> <p>15 LAWYER'S LOUNGE, FOURTH FLOOR</p> <p>16 HOUSTON, TEXAS 77002</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 4</p> <p>1 APPEARANCES (CONT'D)</p> <p>2</p> <p>3 Appearing on behalf of Defendant Jetall Companies:</p> <p>4 JENNIFER MACGEORGE, ESQUIRE</p> <p>5 MacGeorge Law Firm PLLC</p> <p>6 701 Tillery Street, Suite 12</p> <p>7 Austin, TX 78702</p> <p>8 (512) 215-4129</p> <p>9 (713) 583-9686 (Fax)</p> <p>10 jmac@jlm-law.com</p> <p>11</p> <p>12 Appearing on behalf of Defendant 2727 Kirby 26L LLC:</p> <p>13 PAUL S. KIRKLIN, ESQUIRE</p> <p>14 Kirklin Law Firm PC</p> <p>15 12600 North Featherwood Drive, Suite 225</p> <p>16 Houston, TX 77034</p> <p>17 (832) 969-1821</p> <p>18 (281) 922-6420 (Fax)</p> <p>19 pkirklin@kirklinlaw.com</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>Page 3</p> <p>1 APPEARANCES</p> <p>2</p> <p>3 Appearing on behalf of the Plaintiffs:</p> <p>4 T. MICHAEL BALLASES, ESQUIRE</p> <p>5 Hoover Slovacek</p> <p>6 5051 Westheimer, Suite 1200</p> <p>7 Houston, TX 77056</p> <p>8 (713) 977-8686</p> <p>9 (713) 977-5395 (Fax)</p> <p>10 Ballases@hooverslovacek.com</p> <p>11</p> <p>12 Appearing on behalf of the Defendants:</p> <p>13 JAMES POPE, ESQUIRE</p> <p>14 The Pope Law Firm</p> <p>15 6161 Savoy Drive, Suite 1125</p> <p>16 Houston, TX 77034</p> <p>17 (713) 999-8917</p> <p>18 jamesp@thepopelawfirm.com</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 5</p> <p>1 APPEARANCES (CONT'D)</p> <p>2</p> <p>3 Appearing on behalf of Defendant Shahnaz Choudhri:</p> <p>4 LENARD M. PARKINS, ESQUIRE</p> <p>5 Parkins & Rubio LLP</p> <p>6 100 Park Avenue, Suite 1600</p> <p>7 New York, NY 10017</p> <p>8 (713) 715-1666</p> <p>9 jparkins@parkinsrubio.com</p> <p>10</p> <p>11 ALSO PRESENT:</p> <p>12 John Quinlan, Plaintiff</p> <p>13 Osama Abdullatif, Plaintiff</p> <p>14 Ali Choudhri, Defendant</p> <p>15 Dward Darjeen, Corp. Representative, 9201 Memorial</p> <p>16 Gene McGubbin, Corp. Representative, 2727 Kirby</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>1 EXAMINATION INDEX Page 6</p> <p>2 Page</p> <p>3</p> <p>4 EXAMINATION BY MR. POPE 9</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 DEPOSITION OF Page 8</p> <p>2 OMAR KHAWAJA</p> <p>3 TAKEN ON</p> <p>4 THURSDAY, OCTOBER 3, 2024</p> <p>5 11:03 A.M.</p> <p>6</p> <p>7 THE VIDEOGRAPHER: We are now on the record.</p> <p>8 Today's date is Thursday, October 3rd, 2024. The time is</p> <p>9 11:03 a.m. This is the deposition of Omar Khawaja taken in</p> <p>10 the matter of Quinlan v. Houston Real Estate Properties.</p> <p>11 Would counsel please introduce yourselves and</p> <p>12 state whom you represent, after which the court reporter</p> <p>13 will swear in the witness.</p> <p>14 MR. POPE: James Pope, P-o-p-e, here on behalf of</p> <p>15 the Defendants.</p> <p>16 MR. LEYH: Steven Leyh, Hoover Slovacek, here on</p> <p>17 behalf of the Plaintiffs.</p> <p>18 THE REPORTER: Mr. Khawaja, will you please raise</p> <p>19 your right hand? Do you affirm under penalty of perjury</p> <p>20 that the testimony you are about to give will be the truth,</p> <p>21 the whole truth, and nothing but the truth?</p> <p>22 THE DEPONENT: I do.</p> <p>23 THE REPORTER: Thank you, sir.</p> <p>24 Counsel, please proceed.</p> <p>25 OMAR KHAWAJA, having been first duly affirmed to tell the</p>
<p>1 EXHIBIT INDEX Page 7</p> <p>2 Exhibit Page</p> <p>3</p> <p>4 1 WYATT UNSWORN DECLARATION 29</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 truth, was examined, and testified as follows: Page 9</p> <p>2 EXAMINATION</p> <p>3 BY MR. POPE:</p> <p>4 Q. Mr. Khawaja, can you state your full name for the</p> <p>5 record?</p> <p>6 A. Omar Khawaja.</p> <p>7 Q. What's your current address?</p> <p>8 A. Current address is 5177 Richmond, Suite 1065,</p> <p>9 Houston, Texas, 77056.</p> <p>10 Q. What's your date of birth?</p> <p>11 A. 9/12/78.</p> <p>12 Q. What's your educational background?</p> <p>13 A. Lawyer.</p> <p>14 Q. How long have you been a lawyer?</p> <p>15 A. Since 2010.</p> <p>16 Q. Licensed in which state?</p> <p>17 A. Texas.</p> <p>18 Q. Can you describe your employment history? Are</p> <p>19 you a solo practitioner? You work for a firm?</p> <p>20 A. Solo practitioner.</p> <p>21 Q. What's the name of your firm?</p> <p>22 A. Law Offices of and my name.</p> <p>23 Q. What's your connection to Hoover Slovacek?</p> <p>24 A. They are my attorneys.</p> <p>25 Q. They're your attorneys. What's your relationship</p>

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<p style="text-align: right;">Page 10</p> <p>1 to John Quinlan?</p> <p>2 A. John's a business partner.</p> <p>3 Q. Of yours?</p> <p>4 A. Yes.</p> <p>5 Q. And what's your relation to Osama Abdullatif?</p> <p>6 A. He's also a business partner.</p> <p>7 Q. Of yours?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. Are you familiar with a company called</p> <p>10 Khawaja Law Group, PLLC?</p> <p>11 A. Yes.</p> <p>12 Q. What -- what is that company?</p> <p>13 A. I think it's my corporate entity.</p> <p>14 Q. Your corporate entity? It's a PLLC; is that</p> <p>15 correct?</p> <p>16 A. That's right.</p> <p>17 Q. All right. Are you the only member of that?</p> <p>18 A. Yes.</p> <p>19 Q. Are you its managing member?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. How about Marathon Creative Collective,</p> <p>22 LLC?</p> <p>23 A. Yes.</p> <p>24 Q. What is that?</p> <p>25 A. It's just another entity that I own that I'm part</p>	<p style="text-align: right;">Page 12</p> <p>1 A. I don't know what that is.</p> <p>2 Q. Okay. How about ADMP, LLC?</p> <p>3 A. Yeah, that's -- I'm a managing member of that.</p> <p>4 Q. All right. Does it have any other members?</p> <p>5 A. I think my sister is also a member of that one.</p> <p>6 Q. What's your sister's name?</p> <p>7 A. Sovat Khawaja.</p> <p>8 Q. Can you spell that first name for me?</p> <p>9 A. S-o-v-a-t.</p> <p>10 Q. S-o-v-a-t. How about the Law Offices of Omar</p> <p>11 Khawaja, PLLC?</p> <p>12 A. Yes, that's my entity.</p> <p>13 Q. Okay. So are you currently operating both</p> <p>14 Khawaja Law Group, PLLC and the Law Offices of Omar</p> <p>15 Khawaja, PLLC?</p> <p>16 A. Yes.</p> <p>17 Q. What practice areas does Khawaja Law Group, PLLC</p> <p>18 cover?</p> <p>19 A. Personal injury.</p> <p>20 Q. What practice areas does the Law Offices of Omar</p> <p>21 Khawaja, PLLC cover?</p> <p>22 A. Personal injury.</p> <p>23 Q. Are you a lawyer for Mr. John Quinlan?</p> <p>24 A. Yes.</p> <p>25 Q. Since when? How long?</p>
<p style="text-align: right;">Page 11</p> <p>1 of.</p> <p>2 Q. What does it do?</p> <p>3 A. It is entertainment.</p> <p>4 Q. Who are its members?</p> <p>5 A. You know, I am not quite sure. It's been a while</p> <p>6 since we looked at that one.</p> <p>7 Q. Are you a member?</p> <p>8 A. I think I am, yes.</p> <p>9 Q. Are you a managing member?</p> <p>10 A. That, I'm not sure of.</p> <p>11 Q. Is it member-managed or managed by a manager?</p> <p>12 A. I think it's managed by a manager if I'm not</p> <p>13 mistaken.</p> <p>14 Q. How about JMLH Investments, LLC?</p> <p>15 A. That's another corporate entity that I own.</p> <p>16 Q. You own that one?</p> <p>17 A. Yes.</p> <p>18 Q. And what does it do?</p> <p>19 A. Manages real estate.</p> <p>20 Q. Manages real estate. Does it have any members?</p> <p>21 A. Just me, I believe.</p> <p>22 Q. Okay. How about Great Peace Generation</p> <p>23 Foundation ADMP, LLC?</p> <p>24 A. Are those two different ones?</p> <p>25 Q. Oh, Great Peace Generation Foundation.</p>	<p style="text-align: right;">Page 13</p> <p>1 A. I can't remember now. Since I met him maybe a</p> <p>2 few years back.</p> <p>3 Q. When did -- what year did you meet him?</p> <p>4 A. Maybe 2020, 2019.</p> <p>5 Q. Okay. Are you also the attorney for Osama</p> <p>6 Abdullatif?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And how long have you been Osama</p> <p>9 Abdullatif's attorney?</p> <p>10 A. Maybe since 2013 perhaps.</p> <p>11 Q. How long have you known Osama Abdullatif?</p> <p>12 A. Since 2013.</p> <p>13 Q. How did you come to meet Mr. Abdullatif?</p> <p>14 A. I met him in the context of he was litigating</p> <p>15 against Mr. Choudhri.</p> <p>16 Q. Did he call you, or did you call him?</p> <p>17 A. I -- I think we were introduced. I think we were</p> <p>18 introduced to one another. I -- I can't remember who</p> <p>19 called. Maybe I called him, actually.</p> <p>20 Q. Who introduced you two?</p> <p>21 A. I don't remember. It was a long time ago.</p> <p>22 Q. Were you introduced in a courtroom, over dinner?</p> <p>23 Where -- do you remember where you --</p> <p>24 A. From what I recall, it was a dinner, a lunch, or</p> <p>25 something like that.</p>

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14 to 17

<p style="text-align: right;">Page 14</p> <p>1 Q. With just you and Mr. -- you and Mr. Abdullatif?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. How about the company Eastern Med</p> <p>4 Enterprise, LLC?</p> <p>5 A. Not familiar with that one.</p> <p>6 Q. How about MKZ Foods, LLC?</p> <p>7 MR. LEYH: I'm sorry. I couldn't understand what</p> <p>8 you said.</p> <p>9 MR. POPE: M, as in Mary, K, as in kite, Z, as in</p> <p>10 zebra, Foods, LLC.</p> <p>11 MR. LEYH: Thank you.</p> <p>12 THE DEPONENT: Yes, that's another entity that I</p> <p>13 --</p> <p>14 BY MR. POPE:</p> <p>15 Q. And what does it do?</p> <p>16 A. Operates food businesses.</p> <p>17 Q. And how long have you -- has that business been</p> <p>18 in existence?</p> <p>19 A. I think this year maybe.</p> <p>20 Q. Okay. Does it have any members?</p> <p>21 A. Just me.</p> <p>22 Q. Just you. How about Khawaja Brothers, LLC?</p> <p>23 A. That is a real estate company.</p> <p>24 Q. Does it have any members?</p> <p>25 A. I believe myself and also Ibrahim Khawaja.</p>	<p style="text-align: right;">Page 16</p> <p>1 own?</p> <p>2 A. Office real estate in Sugar Land.</p> <p>3 Q. Office real estate in Sugar Land. So most all of</p> <p>4 these entities, you're the only member of them, correct?</p> <p>5 A. Sounds like it, yes.</p> <p>6 Q. Are they each the alter ego of the other?</p> <p>7 A. No.</p> <p>8 Q. Are they your alter ego?</p> <p>9 A. No.</p> <p>10 Q. Where is the bank account held for Khawaja Law</p> <p>11 Group, PLLC?</p> <p>12 A. The bank account? I'm not --</p> <p>13 Q. Does it have a bank account?</p> <p>14 A. I'm sure it does.</p> <p>15 Q. And what entity holds that account?</p> <p>16 A. I'm going to -- I'm not going to answer these</p> <p>17 questions.</p> <p>18 MR. LEYH: Objection, form.</p> <p>19 BY MR. POPE:</p> <p>20 Q. Okay. Does JMLH Investments have a bank account?</p> <p>21 MR. LEYH: Objection, form.</p> <p>22 THE DEPONENT: Yeah, I'm done -- not going to</p> <p>23 answer those questions.</p> <p>24 BY MR. POPE:</p> <p>25 Q. You're not going to answer any questions</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. And say that name for me again?</p> <p>2 A. Ibrahim Khawaja.</p> <p>3 Q. Is that your brother?</p> <p>4 A. No, he's just a good friend of mine.</p> <p>5 Q. Okay. Rahim Wows, LLC?</p> <p>6 A. Yes.</p> <p>7 Q. What is that company?</p> <p>8 A. Just -- it makes furniture.</p> <p>9 Q. Okay. And how long has it been in existence?</p> <p>10 A. I think this year.</p> <p>11 Q. This year. All right. Does it have any members?</p> <p>12 A. I believe myself and Rahim.</p> <p>13 Q. Rahim -- what's Rahim's last name?</p> <p>14 A. Akbar.</p> <p>15 Q. Akbar. How about Sugar Creek SWF, LLC?</p> <p>16 A. Yes, that's an entity that I own.</p> <p>17 Q. Okay. And does it have any members?</p> <p>18 A. Just myself.</p> <p>19 Q. Just yourself. And what does it do?</p> <p>20 A. Real estate.</p> <p>21 Q. It's a real estate. Do you have any other</p> <p>22 companies other than the ones that we've gone through</p> <p>23 today?</p> <p>24 A. I believe that's it.</p> <p>25 Q. Okay. What real estate does Sugar Creek SWF, LLC</p>	<p style="text-align: right;">Page 17</p> <p>1 regarding the bank accounts --</p> <p>2 A. No.</p> <p>3 Q. -- of any of the entities?</p> <p>4 A. Not at all.</p> <p>5 Q. Okay. Maybe a better question is has Khawaja Law</p> <p>6 Group, PLLC made any financial transfers to Marathon</p> <p>7 Creative Collective, LLC?</p> <p>8 MR. LEYH: I'm sorry. I -- try again. I</p> <p>9 couldn't understand the question.</p> <p>10 MR. POPE: Oh, not a problem.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Has Khawaja Law Group, PLLC transferred any funds</p> <p>13 to Marathon Creative Collective, LLC?</p> <p>14 MR. LEYH: Objection, form.</p> <p>15 BY MR. POPE:</p> <p>16 Q. Have you put any of your personal funds into a</p> <p>17 financial account for Khawaja Law Group, PLLC?</p> <p>18 MR. LEYH: Objection, form.</p> <p>19 THE DEPONENT: Sorry. I'm -- I'm not going to</p> <p>20 answer those questions.</p> <p>21 BY MR. POPE:</p> <p>22 Q. Do you know Hira Azhar?</p> <p>23 A. Not going to answer that question, either.</p> <p>24 Q. Okay. Do you know Azeemeh Zaheer?</p> <p>25 MR. LEYH: Objection, form.</p>

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18 to 21

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1 THE DEPONENT: Also not answering that question.
2 BY MR. POPE:
3 Q. Do you know Chris Wyatt?
4 MR. LEYH: Objection, form.
5 THE DEPONENT: I'm not answering that question.
6 BY MR. POPE:
7 Q. So you're refusing to answer any questions
8 regarding Azeemeh Zaheer, Hira Azhar, or Christopher -- or
9 Chris Wyatt?
10 A. That's --
11 MR. LEYH: Objection, form.
12 BY MR. POPE:
13 Q. Are you being instructed not to answer, or are
14 you choosing not to answer?
15 A. I'm choosing not to answer.
16 Q. Why?
17 A. They're outside the scope of this deposition.
18 Q. Okay. Have you -- how about Harold Polk? Do you
19 know Harold Polk?
20 MR. LEYH: Objection, form.
21 THE DEPONENT: I'm not going to answer that
22 question.
23 BY MR. POPE:
24 Q. Okay. Have you -- how about Wayne Dolcefino?
25 A. Also not going to answer that question.

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1 Q. Okay. How do we know that any reference to any
2 of these individuals is outside the scope of today's
3 deposition?
4 A. Because the deposition is about the claims that I
5 hold as a --
6 Q. What -- what claims do you hold?
7 A. -- as a judgment creditor.
8 Q. A judgment creditor for whom?
9 A. Against general companies.
10 Q. Individually?
11 A. I hold them, yeah, individually. Yes.
12 Q. Okay.
13 A. Yes.
14 Q. You hold judgments from which cases?
15 A. The cases that -- I mean they're referenced in
16 the petition. So you have the petition in front of you.
17 Q. Okay. You don't remember the cases?
18 A. I -- I mean I don't have the case number on my --
19 no.
20 Q. Not the case number per say. You remember the
21 parties to the cases?
22 A. I think Hoover Slovacek is one of the cases.
23 Q. When -- when did you first begin communications
24 with Hoover Slovacek?
25 MR. LEYH: Objection.

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1 THE DEPONENT: You know --
2 BY MR. POPE:
3 Q. Okay.
4 A. You know you can't ask that question.
5 MR. LEYH: Attorney-client.
6 BY MR. POPE:
7 Q. Can you describe any specific actions taken by
8 Jetall Companies that you believe improper in its
9 relationship with the other Defendants?
10 A. I -- I mean I think all of our allegations are
11 outlined in our claims and the petition, and I believe you
12 have the petition in front of you. I'm happy to read it if
13 you'd like me to.
14 Q. So you can't state any at the moment.
15 A. I mean not to my memory, no.
16 Q. Okay.
17 A. If you want me to recite what we filed against
18 them, I don't know.
19 Q. Okay. Do you have any examples -- are you aware
20 of any examples of instances when assets were transferred
21 between Jetall and any other entity named as a Defendant or
22 person?
23 MR. LEYH: Objection, form.
24 THE DEPONENT: Again, I think that's going to be
25 part of our discovery. I don't have anything specific that

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1 I've looked at. That's my attorneys -- or my attorneys are
2 reviewing that.
3 BY MR. POPE:
4 Q. Who drafted the complaint?
5 A. My attorneys.
6 Q. Did you take any part in drafting of the
7 complaint?
8 A. Privileged.
9 MR. LEYH: Objection, form, privileged.
10 BY MR. POPE:
11 Q. And I just want to confirm. You're choosing not
12 to answer, or are you being instructed not to answer
13 because of --
14 MR. LEYH: The last -- the last one, he was
15 instructed not to answer. It's attorney-client privileged.
16 BY MR. POPE:
17 Q. Can you point to any specific act or actual fraud
18 committed by Jetall Companies?
19 A. In what context.
20 Q. In any context.
21 A. I believe there's been findings of fraud against
22 Jetall Companies and your client in the past, but I'm not
23 sure when or where.
24 Q. Have you had any direct business relationship
25 with Jetall Companies?

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22 to 25

<p style="text-align: right;">Page 22</p> <p>1 A. Yes.</p> <p>2 Q. And what is that contact or relationship?</p> <p>3 A. It's in the context of other pending litigation,</p> <p>4 so I'm not going to talk about that.</p> <p>5 Q. Okay. And with you as the -- with you as the</p> <p>6 defendant or you as the attorney?</p> <p>7 A. I think I am a party, just a party in that.</p> <p>8 Q. As a plaintiff or defendant?</p> <p>9 A. Plaintiff or defendant, counter defendant,</p> <p>10 something like that.</p> <p>11 Q. Okay. How much litigation do you have with</p> <p>12 Jetall?</p> <p>13 A. I think that's it.</p> <p>14 Q. Just one?</p> <p>15 A. Just that one case.</p> <p>16 Q. Okay. What's -- what's the style of the case?</p> <p>17 A. I don't have that on me.</p> <p>18 Q. Did you sue them in your individual capacity or</p> <p>19 in -- in -- in the name of one of your entities?</p> <p>20 A. In the name of an entity.</p> <p>21 Q. What's the name -- what entity is that?</p> <p>22 A. I think it's Khawaja Partners.</p> <p>23 Q. Khawaja Partners. Is that an LLC or a</p> <p>24 corporation?</p> <p>25 A. I believe it's a partnership.</p>	<p style="text-align: right;">Page 24</p> <p>1 A. And then Sovat.</p> <p>2 Q. All have the same last name?</p> <p>3 A. Same last name.</p> <p>4 Q. Okay. Do you have any direct dealings with</p> <p>5 Arabella PH 3201 LLC?</p> <p>6 A. I do not.</p> <p>7 Q. Having any dealings with 9201 Memorial Drive,</p> <p>8 LLC?</p> <p>9 A. I do not.</p> <p>10 Q. Any direct dealings with 2727 Kirby 26L?</p> <p>11 A. Just for clarification, what do you mean direct</p> <p>12 dealings?</p> <p>13 Q. Have you had any connection with them, whether a</p> <p>14 transaction or business dealings or agreements with them or</p> <p>15 contracts with them in any capacity?</p> <p>16 A. Other than their status as Defendants in this</p> <p>17 case, no.</p> <p>18 Q. Okay. How about Texas Reit LLC?</p> <p>19 A. No.</p> <p>20 Q. Dalio Holdings I, LLC.</p> <p>21 A. No.</p> <p>22 Q. Dalio Holdings II, LLC.</p> <p>23 A. No.</p> <p>24 Q. Shepherd-Huldy Development I.</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. It's a partnership with whom?</p> <p>2 A. Now it's -- it's -- I believe I'm the only</p> <p>3 partner.</p> <p>4 Q. You're the only partner?</p> <p>5 A. Correct.</p> <p>6 Q. Who were the previous partners?</p> <p>7 A. At one point, it was my family members, my</p> <p>8 parents.</p> <p>9 Q. And what's your parents' names? What's your</p> <p>10 mom's name?</p> <p>11 A. Yeah, Teskeen Khawaja.</p> <p>12 Q. Can you spell the first name?</p> <p>13 A. Yes, T-e-s-k-e-e-n.</p> <p>14 Q. And your dad's name?</p> <p>15 A. Mahmood, M-a-h-m-o-o-d.</p> <p>16 Q. Any other partners any other time?</p> <p>17 A. You know, I think my siblings were partners at</p> <p>18 some point.</p> <p>19 Q. And how many siblings would that have been?</p> <p>20 A. Three.</p> <p>21 Q. Three. Sibling number one is male, female?</p> <p>22 A. Male, Jamal, J-a-m-a-l.</p> <p>23 Q. And the second sibling?</p> <p>24 A. Jawad, J-a-w-a-d, male.</p> <p>25 Q. And the last sibling.</p>	<p style="text-align: right;">Page 25</p> <p>1 Q. Shepherd-Huldy Development II.</p> <p>2 A. No.</p> <p>3 Q. And Galleria Loop Note Holder.</p> <p>4 A. No.</p> <p>5 Q. How about Shahnaz Choudhri?</p> <p>6 A. No.</p> <p>7 Q. Why did you add them as Defendants in this case</p> <p>8 if you had no dealings with them?</p> <p>9 A. I believe they're -- the -- the petition says</p> <p>10 that they are alter egos of your client.</p> <p>11 MR. LEYH: Can we take a break?</p> <p>12 THE VIDEOGRAPHER: All parties in agreement.</p> <p>13 We're going off the record.</p> <p>14 (WHEREUPON, a recess was taken.)</p> <p>15 THE VIDEOGRAPHER: We're going back on the record</p> <p>16 at 11:32 a.m.</p> <p>17 (WHEREUPON, Mr. Ballases joined the deposition.)</p> <p>18 MR. BALLASES: This is Michael Ballases. I just</p> <p>19 got here from another hearing. I represent the Plaintiffs</p> <p>20 Omar Khawaja, Osama Abdullatif, and John Quinlan. I just</p> <p>21 want to have appearances for the record because there's a</p> <p>22 lot of people in this room who I don't recognize.</p> <p>23 So I've announced who I am. I know who Mr. Leyh</p> <p>24 is, who's representing the witness.</p> <p>25 Can everyone go around the room and announce who</p>

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<p style="text-align: right;">Page 26</p> <p>1 they are, identify themselves?</p> <p>2 MS. MACGEORGE: We identified ourselves for the</p> <p>3 court reporter.</p> <p>4 MR. BALLASES: She already said not everyone made</p> <p>5 appearance on the record, so I want to get that on the</p> <p>6 record.</p> <p>7 MR. POPE: All right. Starting here, James Pope,</p> <p>8 P-O-P-E.</p> <p>9 MR. BALLASES: And counsel for?</p> <p>10 MR. POPE: Counsel for the Defendants Jetall</p> <p>11 Companies, Arabella PH 3201 LLC, 9201 Memorial Drive LLC,</p> <p>12 2727 Kirby 26L LLC, Dalio Holdings I, LLC, Dalio Holdings</p> <p>13 II, LLC, Shepherd-Huldy Development I, LLC, Shepherd-Huldy</p> <p>14 Development II, LLC, and Galleria Loop Note Holder LLC.</p> <p>15 MR. BALLASES: So you didn't announce all the</p> <p>16 parties you've already made an appearance for. So that's a</p> <p>17 motion to dismiss you filed in this case that lists the</p> <p>18 parties.</p> <p>19 MR. POPE: Yeah, I'm -- yeah, I'm just listing</p> <p>20 them here. I'm going to show them to everybody. Jetall</p> <p>21 Companies, Arabella --</p> <p>22 MR. PARKINS: James?</p> <p>23 MR. POPE: Yes?</p> <p>24 MR. PARKINS: Do you have a second before you</p> <p>25 finish? Can I just whisper -- I can't -- I can't get</p>	<p style="text-align: right;">Page 28</p> <p>1 yourself, Mr. Choudhri?</p> <p>2 MR. CHOUDHRI: I'm here, Ali Choudhri.</p> <p>3 MR. PARKINS: Lenard Parkins of Parkins and Rubio</p> <p>4 appearing for the purpose of this deposition for Shahnaz</p> <p>5 Choudhri. That's Mrs. Choudhri, Mr. Ali Choudhri's mother.</p> <p>6 MR. DARJEAN: Dward Darjean, corporate rep.</p> <p>7 MR. BALLASES: Corporate rep with who? Corporate</p> <p>8 representative of who?</p> <p>9 MR. DARJEAN: It's 9201 Memorial.</p> <p>10 THE REPORTER: I'm sorry. What was that? I</p> <p>11 didn't hear.</p> <p>12 MR. DARJEAN: 9201 Memorial.</p> <p>13 MR. MCCUBBIN: Gene McCubbin, 2727 Kirby.</p> <p>14 MR. BALLASES: In -- in what capacity are you</p> <p>15 here? Are you --</p> <p>16 MR. MCCUBBIN: Corporate representative.</p> <p>17 MR. POPE: And who else is in the room?</p> <p>18 MR. BALLASES: So we have Mr. -- my three</p> <p>19 clients, who have already announced, John Quinlan, who's a</p> <p>20 party to this case, Osama Abdullatif, who's a party to this</p> <p>21 case, and the deponent, Omar Khawaja, who's a party to this</p> <p>22 case, and then Steve Leyh from my law firm.</p> <p>23 I'm going to go ahead and invoke the rule, Rule</p> <p>24 615, and so to the extent there are any witnesses in here</p> <p>25 that are not allowed to be in here, I'm going to invoke</p>
<p style="text-align: right;">Page 27</p> <p>1 through. Can I whisper in your ear when you get --</p> <p>2 MR. KIRKLIN: Before you finish, he wants to talk</p> <p>3 to you outside.</p> <p>4 MS. MACGEORGE: Yeah, just in your ear.</p> <p>5 MR. KIRKLIN: Just for a second.</p> <p>6 MR. PARKINS: Just for a second.</p> <p>7 MS. MACGEORGE: He just wants to --</p> <p>8 MR. PARKINS: Excuse us.</p> <p>9 MR. POPE: Okay. Yeah, no problem.</p> <p>10 MR. PARKINS: You don't have to stop the record.</p> <p>11 MR. POPE: All right. Let me start that list</p> <p>12 over again. James Pope, P-o-p-e, here on behalf of Jetall</p> <p>13 Companies, Inc., Arabella PH 3201 LLC, 9201 Memorial Drive</p> <p>14 LLC, 2727 Kirby 26L LLC, Dalio Holdings I, LLC, Dalio</p> <p>15 Holdings II, LLC, Shahnaz Choudhri, Ali Choudhri, Shepherd-</p> <p>16 Huldy Development I, LLC, Shepherd-Huldy Development II,</p> <p>17 LLC, and Galleria Loop Note Holder LLC.</p> <p>18 I will announce for the record that Texas Reit</p> <p>19 LLC also appears on this list, but it was severed from the</p> <p>20 case, and so I'm not representing them today. They're in</p> <p>21 the bankruptcy in the Western District of Texas.</p> <p>22 MS. MACGEORGE: Jennifer MacGeorge appearing in a</p> <p>23 limited capacity for Jetall Companies, Inc.</p> <p>24 MR. KIRKLIN: Paul Kirklin for 2727 Kirby.</p> <p>25 MR. BALLASES: Are you going to announce</p>	<p style="text-align: right;">Page 29</p> <p>1 that and ask them to leave.</p> <p>2 MR. CHOUDHRI: Are we starting the depo or --</p> <p>3 MR. POPE: I'm ready.</p> <p>4 MR. BALLASES: We're on the record.</p> <p>5 MR. POPE: You ready?</p> <p>6 MR. LEYH: Yeah.</p> <p>7 MR. POPE: All right. Give the court reporter</p> <p>8 back the list. I'm going to mark as Exhibit 1 is an -- is</p> <p>9 an unsworn declaration of Christopher Wyatt that was</p> <p>10 attached to the complaint in case number 23-03141 in this</p> <p>11 case, document 1-7.</p> <p>12 (WHEREUPON, Exhibit 1 was marked for</p> <p>13 identification.)</p> <p>14 BY MR. POPE:</p> <p>15 Q. Do you recognize that complaint, Mr. Khawaja -- I</p> <p>16 mean that exhibit?</p> <p>17 MR. LEYH: I'm -- I'm -- I'm objecting to Exhibit</p> <p>18 1 from the court's order of June the 20th, 2024. Due to</p> <p>19 violation of Federal Rule of Civil Procedure 37 and not</p> <p>20 producing any documents, you're prohibited from introducing</p> <p>21 designated matters in evidence that are directly or</p> <p>22 indirectly related to any production requests that were not</p> <p>23 timely produced.</p> <p>24 So I've objected to the exhibit.</p> <p>25 MR. POPE: This is your exhibit to the original</p>

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<p style="text-align: right;">Page 30</p> <p>1 complaint.</p> <p>2 MR. LEYH: I'm not introducing it in the -- in</p> <p>3 the depo today. You're trying to.</p> <p>4 MR. POPE: Can I see a copy of the order that</p> <p>5 you're reading from?</p> <p>6 MR. LEYH: No.</p> <p>7 MR. POPE: Is that the discovery conference</p> <p>8 order?</p> <p>9 MR. LEYH: Yeah.</p> <p>10 MR. POPE: What's the docket number?</p> <p>11 MR. LEYH: 187.</p> <p>12 MR. POPE: Okay.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Are you not going to answer the question about</p> <p>15 whether you recognize Exhibit Number 1?</p> <p>16 A. On advice of counsel, yes.</p> <p>17 Q. Do you have any direct dealings with Christopher</p> <p>18 Wyatt?</p> <p>19 A. What do you mean by direct dealings?</p> <p>20 Q. Have you talked to him?</p> <p>21 A. Anything I've discussed with Chris Wyatt is</p> <p>22 attorney-client privilege.</p> <p>23 Q. With you as his counsel?</p> <p>24 A. Correct.</p> <p>25 Q. Okay. You represent Chris Wyatt in what</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. Do you have any direct dealings with 5700</p> <p>2 Thousand Oaks LLC?</p> <p>3 A. No.</p> <p>4 Q. Do you have any direct dealings with Avondale</p> <p>5 Living LLC?</p> <p>6 A. No.</p> <p>7 Q. Any direct dealings with Broad Oaks Villas LLC?</p> <p>8 A. No.</p> <p>9 Q. Any direct dealings with Board Acres LLC?</p> <p>10 A. No.</p> <p>11 Q. Any direct dealings with Greenville Tower Medical</p> <p>12 Investors LLC?</p> <p>13 A. No.</p> <p>14 Q. Any direct dealings with Harwin Plaza</p> <p>15 International LLC?</p> <p>16 A. No.</p> <p>17 Q. Any direct dealings with Houston Real Estate</p> <p>18 Properties LLC?</p> <p>19 A. No.</p> <p>20 Q. Any direct dealings with Inner Belt Holdings LLC?</p> <p>21 A. No.</p> <p>22 Q. Any direct dealings with Jetall GP LLC?</p> <p>23 A. No.</p> <p>24 Q. Any direct dealings with Memorial Glen Cove LLC?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 31</p> <p>1 instance? In which case?</p> <p>2 MR. LEYH: Objection, form, relevance.</p> <p>3 THE DEPONENT: Not -- not this case.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Not this case. How many cases do you represent</p> <p>6 Chris Wyatt in?</p> <p>7 MR. LEYH: Objection, form.</p> <p>8 BY MR. POPE:</p> <p>9 Q. You can answer the question.</p> <p>10 A. I'm not going to answer that question.</p> <p>11 Q. Why are you not going to answer the question?</p> <p>12 A. Because I don't -- it's not relevant to the</p> <p>13 deposition here today.</p> <p>14 Q. However, it's attached to the complaint that is a</p> <p>15 subject of the deposition today.</p> <p>16 A. He -- I'm not going to answer that question.</p> <p>17 MR. POPE: Okay. Can we mark that, reporter?</p> <p>18 May want to come back to that.</p> <p>19 THE REPORTER: Yes, sir.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Do you have any direct dealings with 50 BH LLC?</p> <p>22 A. No.</p> <p>23 Q. Do you have any direct dealings with 50 Briar</p> <p>24 Hollow LLC?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. Any direct dealings with Memorial Park LLC?</p> <p>2 A. No.</p> <p>3 Q. Any direct dealings with Office North Belt LLC?</p> <p>4 A. No.</p> <p>5 Q. Any direct dealings with 1001 West Loop LLC?</p> <p>6 A. No.</p> <p>7 Q. Any direct dealings with Jetall Investment and</p> <p>8 Realty, Inc.?</p> <p>9 A. No.</p> <p>10 Q. Any direct dealings with 2425 West Loop LP?</p> <p>11 A. No.</p> <p>12 Q. Any direct dealings with 1001 West Loop LP?</p> <p>13 A. No.</p> <p>14 Q. Any direct dealings with Texas Reit LLC?</p> <p>15 A. No.</p> <p>16 Q. Any direct dealings with 1001 WLGP LLC?</p> <p>17 A. No.</p> <p>18 Q. Any direct dealings with 2425 WLGP LLC?</p> <p>19 A. No.</p> <p>20 Q. Any direct dealings with 411 North Belt LLC?</p> <p>21 A. No.</p> <p>22 Q. And just because my eyes could be -- how about</p> <p>23 411 North BKLIT LLC?</p> <p>24 A. No, I don't think so.</p> <p>25 Q. All right. How about West Loop Hospitality LLC?</p>

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<p style="text-align: right;">Page 34</p> <p>1 A. No.</p> <p>2 Q. Any direct dealings with Worldwide Lending Fund</p> <p>3 LLC?</p> <p>4 A. No.</p> <p>5 Q. Any direct dealings with Worldwide Lending</p> <p>6 Organization LLC?</p> <p>7 A. No.</p> <p>8 Q. Any direct dealings with Worldwide Office</p> <p>9 Management LLC?</p> <p>10 A. No.</p> <p>11 Q. Any direct dealings with AIGWT, Inc.?</p> <p>12 A. No.</p> <p>13 Q. Any direct dealings with Jetall Construction and</p> <p>14 Development GP, Inc.?</p> <p>15 A. No.</p> <p>16 Q. Any direct dealings with Jetall Lending, Inc.?</p> <p>17 A. No.</p> <p>18 Q. Any direct dealings with Office Enterprises</p> <p>19 Unlimited, Inc.?</p> <p>20 A. No.</p> <p>21 Q. Any direct dealings with M Exec S LLC?</p> <p>22 A. No.</p> <p>23 Q. Any direct dealings with Houston Metro Executive</p> <p>24 Suites LLC?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. Any direct relation with UMBSGP LLC?</p> <p>2 A. No.</p> <p>3 Q. Any direct relation with Uniform Medical Billing</p> <p>4 Solutions LLC?</p> <p>5 A. No.</p> <p>6 Q. And with those companies that we went through, do</p> <p>7 you have any personal knowledge of them -- give me a</p> <p>8 second.</p> <p>9 Do you have any personal knowledge of any fraud</p> <p>10 committed by any of these entities?</p> <p>11 A. No, I don't -- I mean --</p> <p>12 Q. Do -- do you have any personal knowledge of any</p> <p>13 misrepresentations made by any corporate representative of</p> <p>14 these entities?</p> <p>15 A. Corporate representative. I mean Ali Choudhri</p> <p>16 maybe.</p> <p>17 Q. And so you have personal knowledge of that? Can</p> <p>18 you give an example of -- of what that is?</p> <p>19 A. There have been court findings, jury verdicts.</p> <p>20 Q. As it relates to these entities that I just</p> <p>21 listed.</p> <p>22 A. I don't -- I don't know about these entities.</p> <p>23 Q. Do you have any personal knowledge of any</p> <p>24 racketeering between these entities?</p> <p>25 A. Not personal knowledge, no.</p>
<p style="text-align: right;">Page 35</p> <p>1 Q. Any direct dealings with Office Construction</p> <p>2 Services LLC?</p> <p>3 A. No.</p> <p>4 Q. Any direct dealings with North Park Office Tower</p> <p>5 Group LLC?</p> <p>6 A. No.</p> <p>7 Q. Any direct dealings with North Park Office Tower</p> <p>8 LP?</p> <p>9 A. No.</p> <p>10 Q. Any direct dealings with 2401 Fountain View</p> <p>11 Houston GP LLC?</p> <p>12 A. No.</p> <p>13 Q. Any direct dealings with 2401 Fountain View</p> <p>14 Houston GP LLC?</p> <p>15 A. No.</p> <p>16 Q. Any direct dealings with 2401 Fountain View</p> <p>17 Limited Partner LLC?</p> <p>18 A. No.</p> <p>19 Q. Any direct dealings with StarTex Power LLC?</p> <p>20 A. No.</p> <p>21 Q. Any direct dealings with 1415 NLW LLC?</p> <p>22 A. No.</p> <p>23 Q. Any direct relation with Jetall Construction and</p> <p>24 Development LP?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 37</p> <p>1 Q. Do you have any personal knowledge that they are</p> <p>2 corrupt in any way? The entities.</p> <p>3 A. Speculation or personal knowledge?</p> <p>4 Q. Do you have personal knowledge?</p> <p>5 A. No, not personal knowledge.</p> <p>6 Q. Okay. Any personal knowledge of wire tapping</p> <p>7 between the entities?</p> <p>8 A. I wouldn't know that.</p> <p>9 Q. Any personal knowledge of -- when did you start</p> <p>10 representing Christopher Wyatt?</p> <p>11 MR. LEYH: Objection, attorney-client.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Are you going to answer or not answer at your</p> <p>14 client's --</p> <p>15 A. Not -- not answer on advice of counsel.</p> <p>16 Q. Do you have any personal knowledge of any</p> <p>17 fraudulent transfer of assets between any of the entities</p> <p>18 mentioned?</p> <p>19 A. I -- I don't know that.</p> <p>20 MR. LEYH: Objection, form.</p> <p>21 BY MR. POPE:</p> <p>22 Q. Okay. Do you have any personal knowledge of any</p> <p>23 fraudulent transfers between Jetall Investment and Realty,</p> <p>24 Inc., 1001 West Loop LP, 2425 West Loop LP, Texas Reit LLC,</p> <p>25 1001 WLGP LLC, 2425 WLGP LLC, 411 North Belt LLC, 50 BH</p>

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1 LLC, 50 Briar Hollow LLC, 5700 Thousand Oaks LLC, Avondale
2 Living LLC, Broad Acres Villas LLC, Broad Acres LLC,
3 Greenville Tower Medical Investors LLC, Harwin Flex
4 International LLC, Houston Real Estate Properties LLC,
5 Inner Belt Holdings LLC, Jetall GP LLC, Memorial Glen Cove
6 LLC, Memorial Park LLC, Office Belt -- Office North Belt
7 LLC, West Loop Hospitality LLC, Worldwide Lending Fund LLC,
8 Worldwide Lending Organization LLC, Worldwide Office
9 Management LLC, AIGWT, Inc., Jetall Construction and
10 Development GP, Inc., Jetall Lending, Inc., Office
11 Enterprises Unlimited, Inc., M Exec S LLC, Houston Metro
12 Executive Suites LLC, Office Construction Services LLC,
13 North Park Office Tower GP LLC, North Park Office Tower LP,
14 2401 Fountain View Houston GP LLC, 2401 Fountain View
15 Houston LP, 2401 Fountain View Limited Partner LLC, StarTex
16 Power LLC, 1415 NLW LLC, Jetall Construction and
17 Development LP, UMBS GP LLC, Uniform Medical Billing
18 Solutions, Inc., Arabella PH 3201 LLC, 9201 Memorial Drive
19 LLC, 2727 Kirby 26L LLC, Dalio Holdings I, LLC, Dalio
20 Holdings II, LLC, Shahnaz Choudhri, Ali Choudhri, Shepherd-
21 Huld Development I, LLC, Shepherd-Huld Development II,
22 LLC, Galleria Loop Note Holder LLC?
23 Do you have any personal knowledge of any
24 fraudulent transferred assets --
25 A. Counsel, just before I answer that question, can

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1 we just agree that you say all previous -- previously
2 mentioned Defendants so that --
3 Q. They're not all defendants.
4 MR. BALLASES: Objection, form.
5 THE DEPONENT: Okay. Okay. So you're going to
6 go through this list every single time we talk about --
7 BY MR. POPE:
8 Q. No, I was -- if we can agree that when I say the
9 prior entities and individuals, that we mean everyone just
10 named?
11 A. I'm okay with that.
12 Q. Okay with that? Okay.
13 MR. BALLASES: I'm going to object to the form.
14 I mean I guess. So every entity that you just named, even
15 though lots of them are not parties, you're saying when you
16 say previous entities, it means them, too.
17 MR. POPE: Just in this question here.
18 MR. BALLASES: Okay.
19 MR. POPE: This question here. The next round of
20 questions, what I'll say is any entities previously listed
21 today when I mean all the entities. I'll say any
22 defendants when I mean all defendants. I think that's the
23 best way to -- to kind of deal with it, but I don't have a
24 --
25 MR. BALLASES: Fair enough.

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1 MR. POPE: I'm not going to spend all day with
2 all the entities on your Exhibit 15.
3 MR. BALLASES: Yeah, fair enough.
4 MR. POPE: Okay. So --
5 THE DEPONENT: Can you please re-ask the
6 question?
7 BY MR. POPE:
8 Q. The question is, any of the entities that I've
9 just referenced, do you have any personal knowledge of any
10 fraudulent transferred assets?
11 MR. LEYH: Objection, form.
12 THE DEPONENT: I don't beyond what my attorneys
13 have martialed in discovery. I don't -- I don't have any -
14 - I haven't reviewed the discovery.
15 BY MR. POPE:
16 Q. Okay. Have you reviewed the complaint?
17 A. I have reviewed the complaint, but I don't have
18 it in front of me.
19 Q. Have you reviewed the exhibits to the complaint?
20 THE REPORTER: Just as a reminder, if I can get
21 one at a time for a clean record.
22 THE DEPONENT: I have not looked at the exhibits
23 and the complaint for a while.
24 BY MR. POPE:
25 Q. Do you have any personal knowledge about the

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1 facts -- do you have any personal knowledge regarding all
2 the facts alleged in the complaint?
3 MR. LEYH: Objection, form.
4 THE DEPONENT: I'm not sure if I have personal
5 knowledge of all of the facts alleged in the complaint.
6 I'd refer that to my attorneys.
7 BY MR. POPE:
8 Q. Do you have any personal knowledge of any fraud
9 between all the Defendants and all the entities listed on
10 the Exhibit 5 that we just went through -- on Exhibit 15
11 that we just went through?
12 MR. LEYH: Objection, form.
13 THE DEPONENT: I don't have --
14 MR. LEYH: And -- and I don't know what exhibit
15 that is.
16 MR. POPE: This is an exhibit to the complaint,
17 Exhibit 15 to the complaint filed and lost by the
18 Plaintiff, document 1-16.
19 THE DEPONENT: I don't have personal knowledge
20 beyond what courts have determined and juries have
21 determined and public record.
22 BY MR. POPE:
23 Q. Do you have any personal knowledge about any
24 joint enterprise liability between the Defendants?
25 MR. LEYH: Objection --

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<p style="text-align: right;">Page 42</p> <p>1 THE DEPONENT: I don't.</p> <p>2 MR. LEYH: -- form.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Do you have any personal knowledge of any --</p> <p>5 scratch that. Do you have any personal knowledge of any</p> <p>6 facts that would form the basis of your alter ego claims in</p> <p>7 the petition?</p> <p>8 MR. LEYH: Objection, form.</p> <p>9 THE DEPONENT: You're asking me to make legal</p> <p>10 conclusions, so I'm going to --</p> <p>11 BY MR. POPE:</p> <p>12 Q. So you don't have any personal knowledge?</p> <p>13 A. I don't have any personal knowledge.</p> <p>14 Q. How long have you been an attorney again?</p> <p>15 A. Since 2010.</p> <p>16 Q. And what areas have you practiced in?</p> <p>17 MR. LEYH: Objection, asked and answered.</p> <p>18 MR. POPE: I think the earlier question was what</p> <p>19 practice --</p> <p>20 THE DEPONENT: I do personal injury. I was a</p> <p>21 prosecutor before that?</p> <p>22 BY MR. POPE:</p> <p>23 Q. Do you have any personal knowledge that Jetall</p> <p>24 Companies or any of the other named Defendants diverted any</p> <p>25 assets in any way that directly harmed you individually?</p>	<p style="text-align: right;">Page 44</p> <p>1 a spreadsheet?</p> <p>2 A. It's subpoenas.</p> <p>3 MR. LEYH: Objection, form.</p> <p>4 THE DEPONENT: Subpoenas provided by the banks</p> <p>5 because your client didn't give us discovery.</p> <p>6 BY MR. POPE:</p> <p>7 Q. Which banks did you subpoena?</p> <p>8 A. Not sure.</p> <p>9 Q. Are you attempting to collect on any judgments in</p> <p>10 this case?</p> <p>11 MR. LEYH: I'm sorry? James, I just couldn't</p> <p>12 understand.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Are you attempting to collect on any judgments in</p> <p>15 this case?</p> <p>16 A. I think that's why we're all here today.</p> <p>17 Q. Judgments entered on behalf of whom?</p> <p>18 A. The entities -- on behalf of -- on behalf of</p> <p>19 whom?</p> <p>20 Q. Mm-hmm.</p> <p>21 A. I mean on my own behalf.</p> <p>22 Q. So to the extent we would ask any questions</p> <p>23 regarding Chris Wyatt, Azeemeh Zaheer, or Wayne Dolcefino,</p> <p>24 or Harold Polk, or Osama Abdullatif, or Michael Ballases,</p> <p>25 John Quinlan, or Hoover Slovacek --</p>
<p style="text-align: right;">Page 43</p> <p>1 MR. LEYH: Objection, form.</p> <p>2 THE DEPONENT: Again, legal conclusion. I mean I</p> <p>3 -- I -- I -- I don't know the answer to that question.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Are you aware of any facts that would lead you to</p> <p>6 -- are you aware of any facts of which you have personal</p> <p>7 knowledge that would support your allegation that funds</p> <p>8 were diverted between the Defendants?</p> <p>9 MR. LEYH: Objection, form.</p> <p>10 THE DEPONENT: Beyond what's in our discovery, I</p> <p>11 -- I don't know.</p> <p>12 BY MR. POPE:</p> <p>13 Q. What's in your discovery?</p> <p>14 A. Our discovery would show that there's assets</p> <p>15 being transferred back and forth between the entities.</p> <p>16 Q. Have you reviewed your discovery?</p> <p>17 A. I've -- I've looked at it briefly.</p> <p>18 Q. What did it consist of?</p> <p>19 MR. LEYH: Objection, form.</p> <p>20 THE DEPONENT: Asset transfers between entities.</p> <p>21 BY MR. POPE:</p> <p>22 Q. Between which entities?</p> <p>23 A. I -- I can't recall. We have the discovery</p> <p>24 available.</p> <p>25 Q. The discovery is in what form? Is it a -- is it</p>	<p style="text-align: right;">Page 45</p> <p>1 MR. LEYH: I didn't --</p> <p>2 BY MR. POPE:</p> <p>3 Q. -- would you be answering --</p> <p>4 MR. LEYH: I don't --</p> <p>5 BY MR. POPE:</p> <p>6 Q. -- would you be answering any questions regarding</p> <p>7 any of those individuals?</p> <p>8 MR. BALLASES: Objection, form.</p> <p>9 MR. LEYH: I -- wait, wait. I didn't understand</p> <p>10 the question.</p> <p>11 BY MR. POPE:</p> <p>12 Q. The question is, if I were to ask any questions</p> <p>13 regarding Chris Wyatt -- okay. Were you a party to the</p> <p>14 case of Osama Abdullatif and Abdullatif and Company LLC</p> <p>15 versus Ali Choudhri and Houston Real Estate Properties LLC</p> <p>16 filed under 334?</p> <p>17 A. I -- I don't think that has anything to do with</p> <p>18 this case, Counsel. I'm going to --</p> <p>19 Q. Okay. Were you a -- do you have -- were you a</p> <p>20 party at all in the case of Jetall Companies, Inc. and</p> <p>21 Declaration Title Company LLC --</p> <p>22 A. No.</p> <p>23 Q. -- versus --</p> <p>24 A. Sorry.</p> <p>25 Q. Okay.</p>

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<p style="text-align: right;">Page 46</p> <p>1 A. Let me finish.</p> <p>2 Q. I'll finish the -- the cite -- versus Allan B.</p> <p>3 Daughtry, Attorney at Law, Richard Heil, Todd Oakum, Renee</p> <p>4 Davy, f/k/a Renee Oakum, but I think your answer is no?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. Were you a party in any way to Jetall</p> <p>7 Companies, Inc. v. Hoover Slovacek LLP referenced by case</p> <p>8 number 20238738?</p> <p>9 A. No, I wasn't.</p> <p>10 MR. LEYH: Objection, form.</p> <p>11 THE DEPONENT: No, I was not.</p> <p>12 BY MR. POPE:</p> <p>13 Q. You were not? Were you counsel to any party in</p> <p>14 that case?</p> <p>15 MR. LEYH: Objection, form.</p> <p>16 THE DEPONENT: I don't believe so, no.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Okay. Did you participate in any way in that</p> <p>19 case?</p> <p>20 MR. LEYH: Objection, form.</p> <p>21 THE DEPONENT: I did not.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Were you a witness in that case?</p> <p>24 MR. LEYH: Objection, form.</p> <p>25 THE DEPONENT: I was not.</p>	<p style="text-align: right;">Page 48</p> <p>1 MR. BALLASES: Objection, form.</p> <p>2 THE DEPONENT: I mean if it's not in our</p> <p>3 discovery, I wouldn't know, and I -- I -- I don't -- I</p> <p>4 haven't reviewed the discovery, but I don't have any</p> <p>5 personal knowledge as we sit here today.</p> <p>6 BY MR. POPE:</p> <p>7 Q. Okay. Do you have any personal knowledge that</p> <p>8 any named Defendant filed a fraudulent lien?</p> <p>9 MR. LEYH: Objection, form.</p> <p>10 MR. BALLASES: Objection, form.</p> <p>11 MR. LEYH: And I think also asked and answered.</p> <p>12 THE DEPONENT: No.</p> <p>13 MR. POPE: And I would like to -- to determine</p> <p>14 are you both attorneys going to be objecting, or is only</p> <p>15 one going to be objecting. How are we doing that today?</p> <p>16 Are we tag-teaming?</p> <p>17 MR. KIRKLIN: So can we all object?</p> <p>18 MR. POPE: I think we need to just have one. Can</p> <p>19 we determine which attorney will be objecting here?</p> <p>20 MR. BALLASES: Yeah. You want to --</p> <p>21 MR. LEYH: Whatever you want to do.</p> <p>22 MR. BALLASES: Yeah, you can do it.</p> <p>23 MR. POPE: So that "you can do it", for the</p> <p>24 record, is Mr. Leyh is going to be the one objecting,</p> <p>25 correct?</p>
<p style="text-align: right;">Page 47</p> <p>1 BY MR. POPE:</p> <p>2 Q. When did you obtain an assignment of the judgment</p> <p>3 for that case?</p> <p>4 A. That's attorney-client privilege.</p> <p>5 Q. When you obtained an assignment is attorney-</p> <p>6 client privilege?</p> <p>7 MR. BALLASES: So let me just interject. It's</p> <p>8 attached to our complaint, so the answer is there.</p> <p>9 BY MR. POPE:</p> <p>10 Q. So you don't know when?</p> <p>11 A. If it's in our complaint, it's in our complaint.</p> <p>12 Q. Until your -- until Mr. Ballases told you, were</p> <p>13 you aware it was in your complaint?</p> <p>14 A. Not sure.</p> <p>15 Q. Do you have any personal knowledge that any</p> <p>16 Defendant falsified promissory note or lien?</p> <p>17 A. Do I have personal knowledge?</p> <p>18 Q. Do you have personal knowledge that any of the</p> <p>19 named Defendants falsified any promissory notes or liens?</p> <p>20 MR. LEYH: Objection, form.</p> <p>21 THE DEPONENT: I don't have any personal</p> <p>22 knowledge.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Do you have any personal knowledge that any of</p> <p>25 the named Defendants falsified any agreements?</p>	<p style="text-align: right;">Page 49</p> <p>1 MR. BALLASES: Yes.</p> <p>2 MR. POPE: Okay.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Have you directly incurred any monetary damages</p> <p>5 as a result of any action of any of the named Defendants?</p> <p>6 MR. LEYH: Objection, form.</p> <p>7 THE DEPONENT: I mean I -- I'm a judgment</p> <p>8 creditor, and the judgment hasn't been paid, so yes.</p> <p>9 BY MR. POPE:</p> <p>10 Q. Which judgment hasn't been paid?</p> <p>11 A. The judgments that were assigned to me.</p> <p>12 Q. Which ones were assigned to you?</p> <p>13 A. The judgments that are in our petition.</p> <p>14 Q. Okay. But earlier, you said one of the judgments</p> <p>15 you were no party to, which was in your petition.</p> <p>16 A. The first two judgments. Sorry.</p> <p>17 Q. The first two judgments.</p> <p>18 A. Yes. Not the Texas Reit judgment.</p> <p>19 Q. Okay. However, it -- however, it was the first</p> <p>20 judgment that you said you had no --</p> <p>21 MR. LEYH: Objection, form.</p> <p>22 THE DEPONENT: If you want to show me the</p> <p>23 petition, I can reference it.</p> <p>24 BY MR. POPE:</p> <p>25 Q. I think your attorneys told us we can't do that.</p>

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<p style="text-align: right;">Page 50</p> <p>1 A. What's your -- what's your question, Counsel?</p> <p>2 Sorry.</p> <p>3 Q. I have no question on the table at the moment.</p> <p>4 A. Okay. Counsel, if you can tell your client to</p> <p>5 stop pointing and gesticulating over there and whispering</p> <p>6 while you're -- while you're doing this, it would be</p> <p>7 better. It's disrupting me.</p> <p>8 Q. I'd like you just to focus on me.</p> <p>9 A. I'll do that.</p> <p>10 Q. Do you have any personal knowledge of any intent</p> <p>11 to defraud a creditor -- do you have any personal knowledge</p> <p>12 that any of the named Defendants had ever intended to</p> <p>13 defraud a creditor?</p> <p>14 MR. LEYH: Objection, form.</p> <p>15 THE DEPONENT: I -- I don't.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Do you have any personal knowledge that any of</p> <p>18 the named Defendants transferred assets to an insider?</p> <p>19 MR. LEYH: Objection, form.</p> <p>20 THE DEPONENT: Unless it's in our discovery, I</p> <p>21 don't.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Do you have any personal knowledge that any of</p> <p>24 the named Defendants retained control or possession of an</p> <p>25 asset after an alleged transfer?</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. Okay. Do you have any personal knowledge of any</p> <p>2 of the named Defendants being a bad actor as to incur debt</p> <p>3 or liability?</p> <p>4 MR. LEYH: Objection, form.</p> <p>5 THE DEPONENT: I don't.</p> <p>6 BY MR. POPE:</p> <p>7 Q. Do you have any personal knowledge of any agency</p> <p>8 agreements being utilized to conceal a transfer?</p> <p>9 MR. LEYH: Objection, form.</p> <p>10 THE DEPONENT: I think your client uses agency</p> <p>11 agreements to conceal transfers, yes.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Do you have personal knowledge?</p> <p>14 A. I -- I --</p> <p>15 MR. LEYH: Objection, form.</p> <p>16 THE DEPONENT: -- witnessed testimony in courts,</p> <p>17 yes.</p> <p>18 BY MR. POPE:</p> <p>19 Q. So you're saying yes, you have personal</p> <p>20 knowledge?</p> <p>21 A. I -- if I've heard testimony about it, I would</p> <p>22 say yes.</p> <p>23 Q. So you're saying yes, you have personal</p> <p>24 knowledge?</p> <p>25 A. Yes, I do.</p>
<p style="text-align: right;">Page 51</p> <p>1 MR. LEYH: Objection, form.</p> <p>2 THE DEPONENT: I don't.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Do you have any personal knowledge that any of</p> <p>5 the named Defendants concealed a transfer?</p> <p>6 MR. LEYH: Objection, form.</p> <p>7 THE DEPONENT: I don't.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Do you have any personal knowledge that any of</p> <p>10 the named Defendants failed to receive like or reasonable</p> <p>11 value for any transferred asset?</p> <p>12 MR. LEYH: Objection, form.</p> <p>13 THE DEPONENT: I don't.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Do you have any personal knowledge that any of</p> <p>16 the named Defendants encumbered an asset with debt or</p> <p>17 liabilities?</p> <p>18 MR. LEYH: Objection, form.</p> <p>19 THE DEPONENT: I don't.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Do you have any personal knowledge that any of</p> <p>22 the named Defendants made a transfer?</p> <p>23 MR. LEYH: Objection, form.</p> <p>24 THE DEPONENT: I don't.</p> <p>25 BY MR. POPE:</p>	<p style="text-align: right;">Page 53</p> <p>1 Q. Do you have personal knowledge of which agency</p> <p>2 agreement in particular?</p> <p>3 MR. LEYH: Objection, form.</p> <p>4 THE DEPONENT: He has agency agreements between</p> <p>5 himself and Chris Wyatt --</p> <p>6 BY MR. POPE:</p> <p>7 Q. So you have personal knowledge of an agency</p> <p>8 agreement between Mr. Choudhri and --</p> <p>9 MR. LEYH: I don't think you let him finish his</p> <p>10 answer.</p> <p>11 THE DEPONENT: Chris Wyatt is one, Azeemeh</p> <p>12 Zaheer, Drew Dennett. I believe he has one with Shahnaz as</p> <p>13 well, Choudhri, his -- his mother.</p> <p>14 BY MR. POPE:</p> <p>15 Q. And do you have personal knowledge of those</p> <p>16 agency agreements?</p> <p>17 MR. LEYH: Objection, form.</p> <p>18 THE DEPONENT: I've seen a few of them.</p> <p>19 BY MR. POPE:</p> <p>20 Q. Which ones have you --</p> <p>21 THE REPORTER: I'm sorry. What was your answer?</p> <p>22 I didn't catch it. There was overtalk.</p> <p>23 THE DEPONENT: I've seen a few of them.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Which ones have you seen?</p>

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<p style="text-align: right;">Page 54</p> <p>1 A. I've seen --</p> <p>2 MR. LEYH: Objection, form.</p> <p>3 THE DEPONENT: I've seen the agency agreements</p> <p>4 between Drew Dennett and Ali, Brad Parker and Ali. I've</p> <p>5 seen the Chris Wyatt agency agreement as well, and I can't</p> <p>6 recall if I've seen any others.</p> <p>7 BY MR. POPE:</p> <p>8 Q. And how did you come to see these agreements?</p> <p>9 MR. LEYH: Objection, form.</p> <p>10 THE DEPONENT: I've -- it came across my desk in</p> <p>11 discovery, not sure which case -- not sure which case. I</p> <p>12 represent a lot of people.</p> <p>13 BY MR. POPE:</p> <p>14 Q. So it came across your desk in your capacity as</p> <p>15 an attorney?</p> <p>16 A. As an attorney.</p> <p>17 Q. As an attorney for whom?</p> <p>18 A. I've represented Chris Wyatt. I've represented</p> <p>19 Azeemeh Zaheer.</p> <p>20 Q. Who else have you represented against any of the</p> <p>21 named Defendants?</p> <p>22 MR. LEYH: Objection, form.</p> <p>23 THE DEPONENT: Mr. Abdullatif -- who else -- I</p> <p>24 think that's it.</p> <p>25 BY MR. POPE:</p>	<p style="text-align: right;">Page 56</p> <p>1 BY MR. POPE:</p> <p>2 Q. What was the finding of the court?</p> <p>3 MR. LEYH: Objection, form.</p> <p>4 THE DEPONENT: That the marriage was invalid, but</p> <p>5 that's on appeal.</p> <p>6 BY MR. POPE:</p> <p>7 Q. So in spite of the fact that the court has ruled</p> <p>8 that the marriage was invalid, you still believe them to be</p> <p>9 married?</p> <p>10 A. Yes.</p> <p>11 MR. LEYH: Objection, form.</p> <p>12 BY MR. POPE:</p> <p>13 Q. How many plaintiffs have you represented against</p> <p>14 -- yeah, that's a different question. Let me strike that.</p> <p>15 Are you representing any clients right now who</p> <p>16 has any open and active litigation against any of the named</p> <p>17 Defendants?</p> <p>18 MR. LEYH: Objection, form.</p> <p>19 THE DEPONENT: I'm not sure.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Why -- why aren't you sure?</p> <p>22 MR. LEYH: Objection, form.</p> <p>23 THE DEPONENT: Your client has a lot of</p> <p>24 litigation against him, and I'm not sure if I'm involved in</p> <p>25 any of the pending litigation against him. I don't think I</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. Have you ever represented Hira Azhar --</p> <p>2 A. Yes.</p> <p>3 Q. -- against any of the named -- okay.</p> <p>4 MR. LEYH: Let me object.</p> <p>5 THE DEPONENT: Sorry. Sorry, Steve.</p> <p>6 BY MR. POPE:</p> <p>7 Q. Who is she?</p> <p>8 A. Mr. Choudhri's wife.</p> <p>9 Q. His current wife?</p> <p>10 A. I believe so.</p> <p>11 Q. You believe her to be his current wife?</p> <p>12 A. Correct.</p> <p>13 Q. Based on what?</p> <p>14 A. Based on their marriage.</p> <p>15 Q. Based on their marriage?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And when did they get married?</p> <p>18 MR. LEYH: Objection, form.</p> <p>19 THE DEPONENT: I'm not sure. I think 2011 or</p> <p>20 '10. Not sure.</p> <p>21 BY MR. POPE:</p> <p>22 Q. How do you know they're still married?</p> <p>23 MR. LEYH: Objection, form.</p> <p>24 THE DEPONENT: I think there was a divorce and</p> <p>25 that she has appealed now the -- the finding of the court.</p>	<p style="text-align: right;">Page 57</p> <p>1 am.</p> <p>2 BY MR. POPE:</p> <p>3 Q. How -- how many lawsuits have you been involved</p> <p>4 with as either counsel or a party that involved Mr.</p> <p>5 Choudhri or any of the named Defendants?</p> <p>6 MR. LEYH: Objection, form.</p> <p>7 THE DEPONENT: Maybe three or four.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Maybe three or four.</p> <p>10 A. Yes.</p> <p>11 Q. And are all -- which ones are those?</p> <p>12 MR. LEYH: Objection, form.</p> <p>13 THE DEPONENT: I've represented clients against</p> <p>14 him in his divorce and this case and another case involving</p> <p>15 2425 West Loop, and I think that's it.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Yeah, earlier, you also mentioned that you were</p> <p>18 counsel for John Quinlan and Osama Abdullatif in this case.</p> <p>19 A. Correct.</p> <p>20 Q. Just so the record is clear, you said yes, you</p> <p>21 represent John Quinlan and Osama Abdullatif in this case?</p> <p>22 A. Yes, I've -- I've provided legal advice to them.</p> <p>23 Q. Do you hold any contingency claims against any of</p> <p>24 the Defendants?</p> <p>25 MR. LEYH: Objection, form.</p>

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58 to 61

<p style="text-align: right;">Page 58</p> <p>1 THE DEPONENT: I don't think so.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Have you filed any lis pendenses against any of</p> <p>4 the Defendants?</p> <p>5 MR. LEYH: Objection, form.</p> <p>6 THE DEPONENT: Personally? I am not -- I have</p> <p>7 not filed a personal, I don't believe.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Have you filed any on behalf of any other party</p> <p>10 --</p> <p>11 MR. LEYH: Objection, form.</p> <p>12 BY MR. POPE:</p> <p>13 Q. -- against any of the named Defendants?</p> <p>14 A. No, I have not.</p> <p>15 MR. LEYH: Objection, form.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Have you caused any lis pendenses to be filed</p> <p>18 against any of the named Defendants?</p> <p>19 MR. LEYH: Objection, form.</p> <p>20 THE DEPONENT: Not that I'm aware of.</p> <p>21 BY MR. POPE:</p> <p>22 Q. Are you aware of any lis pendenses being filed</p> <p>23 against any of the named Defendants?</p> <p>24 MR. LEYH: Objection, form.</p> <p>25 THE DEPONENT: I believe so. I believe some lis</p>	<p style="text-align: right;">Page 60</p> <p>1 MR. LEYH: Objection, form.</p> <p>2 THE DEPONENT: Yes.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Can you -- can you tell us what that is?</p> <p>5 A. He has pending claims against him for fraudulent</p> <p>6 transfer.</p> <p>7 Q. What are the facts that you are aware of</p> <p>8 personally that support that contention?</p> <p>9 MR. LEYH: Objection, form.</p> <p>10 THE DEPONENT: It's a good faith basis based on</p> <p>11 public record.</p> <p>12 BY MR. POPE:</p> <p>13 Q. What public records?</p> <p>14 MR. LEYH: Objection, form.</p> <p>15 THE DEPONENT: We can go through the Harris</p> <p>16 County District Clerk and see how many cases are filed</p> <p>17 against him.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Have you done that?</p> <p>20 A. I have.</p> <p>21 Q. How many cases are filed?</p> <p>22 A. Over 50.</p> <p>23 Q. Over 50. How many of those are you involved in?</p> <p>24 MR. LEYH: Objection, form.</p> <p>25 THE DEPONENT: Maybe three or four.</p>
<p style="text-align: right;">Page 59</p> <p>1 pendens have been filed in order to prevent your client</p> <p>2 from transferring assets.</p> <p>3 BY MR. POPE:</p> <p>4 Q. And you believe they were filed by whom?</p> <p>5 MR. LEYH: Objection, form.</p> <p>6 THE DEPONENT: Not sure. Maybe my attorney. Not</p> <p>7 sure.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Well, what -- who's your attorney?</p> <p>10 MR. LEYH: Objection, form.</p> <p>11 THE DEPONENT: Hoover Slovacek.</p> <p>12 BY MR. POPE:</p> <p>13 Q. And you believe they filed lis pendenses against</p> <p>14 some of the named Defendants?</p> <p>15 A. I believe so.</p> <p>16 MR. LEYH: Objection, form.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Which ones?</p> <p>19 A. I don't know.</p> <p>20 Q. What's the basis for them?</p> <p>21 MR. LEYH: Objection, form.</p> <p>22 THE DEPONENT: Because your client fraudulently</p> <p>23 transfers assets.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Do you have personal knowledge of that?</p>	<p style="text-align: right;">Page 61</p> <p>1 BY MR. POPE:</p> <p>2 Q. And -- and you believe all of those relate to</p> <p>3 fraudulent transfers?</p> <p>4 MR. LEYH: Form.</p> <p>5 THE DEPONENT: Not all of them. Fraud --</p> <p>6 BY MR. POPE:</p> <p>7 Q. Which ones?</p> <p>8 MR. LEYH: Form.</p> <p>9 THE DEPONENT: Couldn't say for sure. It's a lot</p> <p>10 of fraud, though.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Are there any written agreements between you and</p> <p>13 Mr. Abdullatif?</p> <p>14 MR. LEYH: Objection, form.</p> <p>15 THE DEPONENT: If there were, I wouldn't disclose</p> <p>16 them.</p> <p>17 BY MR. POPE:</p> <p>18 Q. So are you refusing to answer the question?</p> <p>19 A. Yes.</p> <p>20 Q. Why?</p> <p>21 MR. LEYH: Objection, form.</p> <p>22 THE DEPONENT: Attorney-client privilege.</p> <p>23 BY MR. POPE:</p> <p>24 Q. So the only relation you have with Mr. Abdullatif</p> <p>25 is an attorney-client relationship?</p>

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62 to 65

<p style="text-align: right;">Page 62</p> <p>1 MR. LEYH: Objection, form.</p> <p>2 THE DEPONENT: Not the only relationship.</p> <p>3 BY MR. POPE:</p> <p>4 Q. What are the other relationships?</p> <p>5 MR. LEYH: Objection, form.</p> <p>6 THE DEPONENT: Business investments.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Which ones?</p> <p>9 MR. LEYH: Objection, form.</p> <p>10 THE DEPONENT: I'm not going to get into those.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Any of the named entities that we went through</p> <p>13 earlier?</p> <p>14 MR. LEYH: Objection, form.</p> <p>15 THE DEPONENT: The claims that are a part of this</p> <p>16 case, yes.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Which business that you have an interest in has a</p> <p>19 relationship with Osama Abdullatif?</p> <p>20 MR. LEYH: Objection, form.</p> <p>21 THE DEPONENT: He's my landlord.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Representing what entity? He's your landlord in</p> <p>24 his individual capacity or --</p> <p>25 A. Yeah, my business' landlord.</p>	<p style="text-align: right;">Page 64</p> <p>1 BY MR. POPE:</p> <p>2 Q. Which entity?</p> <p>3 MR. LEYH: Objection, form.</p> <p>4 THE DEPONENT: I think it's SLS.</p> <p>5 BY MR. POPE:</p> <p>6 Q. Who are the owners of SLS?</p> <p>7 MR. LEYH: Objection, form.</p> <p>8 THE DEPONENT: Mr. Abdullatif. I think Danny</p> <p>9 Sheena as well.</p> <p>10 BY MR. POPE:</p> <p>11 Q. Anyone else?</p> <p>12 A. Not --</p> <p>13 MR. LEYH: Objection, form.</p> <p>14 BY MR. POPE:</p> <p>15 Q. What other investments do you have with Mr. Osama</p> <p>16 Abdullatif?</p> <p>17 MR. LEYH: Objection, form.</p> <p>18 THE DEPONENT: I believe that's it.</p> <p>19 BY MR. POPE:</p> <p>20 Q. Do -- do you have any -- other than the attorney-</p> <p>21 client relationship with you and Mr. Quinlan, do you have</p> <p>22 any other relationships with Mr. Quinlan?</p> <p>23 MR. LEYH: Objection, form.</p> <p>24 THE DEPONENT: I do not.</p> <p>25 MR. KIRKLIN: Basis?</p>
<p style="text-align: right;">Page 63</p> <p>1 Q. He's your -- which business?</p> <p>2 MR. LEYH: Objection, form.</p> <p>3 THE DEPONENT: The law office.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Which law office?</p> <p>6 A. The Law Offices of Omar Khawaja.</p> <p>7 MR. POPE: Well, he did testify he had two.</p> <p>8 MR. LEYH: I'm sorry. Are you going to speak up,</p> <p>9 James? I can't hear you. I'm old.</p> <p>10 MR. POPE: Oh, I'm sorry. I was -- I was</p> <p>11 informing Mr. Ballases in response to his gesture that Mr.</p> <p>12 Khawaja had announced earlier he had two law entities,</p> <p>13 legal entities while practicing, so I was just wondering</p> <p>14 which one Mr. Abdullatif was the landlord for.</p> <p>15 BY MR. POPE:</p> <p>16 Q. And is Mr. Abdullatif, in his individual name,</p> <p>17 the landlord or one of his entities?</p> <p>18 MR. LEYH: Objection, form.</p> <p>19 THE REPORTER: I'm sorry. I didn't catch the</p> <p>20 last part of your question, sir.</p> <p>21 BY MR. POPE:</p> <p>22 Q. Is Mr. Abdullatif personally the landlord, or is</p> <p>23 one of Mr. Abdullatif's entities the landlord?</p> <p>24 MR. LEYH: Objection, form.</p> <p>25 THE DEPONENT: Entity.</p>	<p style="text-align: right;">Page 65</p> <p>1 MR. LEYH: Say what?</p> <p>2 MR. KIRKLIN: What is the basis --</p> <p>3 MR. POPE: What's the basis?</p> <p>4 MR. KIRKLIN: -- of your objection.</p> <p>5 MR. LEYH: Relevance.</p> <p>6 MR. BALLASES: Hang on one second. Why is he</p> <p>7 getting to make --</p> <p>8 MR. LEYH: You're done. You're not -- you're</p> <p>9 supposed to be quiet.</p> <p>10 MS. MACGEORGE: Mr. Pope posed it.</p> <p>11 MR. LEYH: Mr. Pope is supposed to be doing this.</p> <p>12 THE DEPONENT: He hasn't been doing it for a</p> <p>13 while.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Do you have a contingency agreement with Hoover</p> <p>16 Slovacek?</p> <p>17 MR. LEYH: Objection, form.</p> <p>18 THE DEPONENT: I do not.</p> <p>19 BY MR. POPE:</p> <p>20 Q. How are you paying them?</p> <p>21 MR. LEYH: Objection, form.</p> <p>22 THE DEPONENT: I think that's --</p> <p>23 MR. LEYH: I think that's privileged. Don't</p> <p>24 answer it.</p> <p>25 THE DEPONENT: Yeah, I think that's privileged.</p>

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66 to 68

<p style="text-align: right;">Page 66</p> <p>1 BY MR. POPE:</p> <p>2 Q. Well, your complaint is also alleging attorney's</p> <p>3 fees. I'm trying to determine how are they amassing these</p> <p>4 fees. Are you being billed by the hour?</p> <p>5 MR. LEYH: Objection, form.</p> <p>6 THE DEPONENT: Hourly billing.</p> <p>7 BY MR. POPE:</p> <p>8 Q. You're hourly billing? You said there was hourly</p> <p>9 billing?</p> <p>10 A. Yes.</p> <p>11 Q. How much have you paid so far in attorney's fees?</p> <p>12 MR. LEYH: Objection, form.</p> <p>13 THE DEPONENT: Hundreds of thousands of dollars.</p> <p>14 I'm not sure.</p> <p>15 MR. POPE: What -- what's the basis of your</p> <p>16 objection?</p> <p>17 MR. LEYH: Relevance --</p> <p>18 MR. POPE: The relevance is --</p> <p>19 MR. LEYH: -- or attorney-client privilege.</p> <p>20 MR. POPE: Okay. Your complaint references</p> <p>21 attorney's fees.</p> <p>22 MR. LEYH: Yeah.</p> <p>23 MR. POPE: And so you're saying attorney's fees</p> <p>24 and questioning regarding attorney's fees are irrelevant?</p> <p>25 MR. LEYH: They are now. We don't have the -- we</p>	<p style="text-align: right;">Page 68</p> <p>1 of --</p> <p>2 BY MR. POPE:</p> <p>3 Q. You don't recall?</p> <p>4 A. I have a lot of businesses and litigations.</p> <p>5 Q. Did you make a payment to Hoover Slovacek --</p> <p>6 THE REPORTER: Just as a reminder, if I can make</p> <p>7 sure I have one at a time for a clean record.</p> <p>8 MR. POPE: Yeah.</p> <p>9 BY MR. POPE:</p> <p>10 Q. Have you made -- have you made any payments to</p> <p>11 Hoover Slovacek in the month of September 2024?</p> <p>12 MR. LEYH: Objection, form.</p> <p>13 THE DEPONENT: I'm not sure. I'm sure I have,</p> <p>14 but I don't recall specifically.</p> <p>15 MR. POPE: Can we take a 10-minute break?</p> <p>16 THE DEPONENT: Sure.</p> <p>17 MR. LEYH: Sure.</p> <p>18 THE VIDEOGRAPHER: All parties in agreement,</p> <p>19 going off the record. Going off the record at 12:19 p.m.</p> <p>20 (WHEREUPON, a recess was taken.)</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 67</p> <p>1 don't have the invoices. We don't have anything to prove</p> <p>2 it right here -- here.</p> <p>3 MR. POPE: So no -- no attorney's fees have been</p> <p>4 incurred to date?</p> <p>5 MR. LEYH: Pardon?</p> <p>6 MR. POPE: No attorney's fees have been incurred</p> <p>7 to date?</p> <p>8 MR. LEYH: I didn't say that.</p> <p>9 MR. POPE: Okay.</p> <p>10 BY MR. POPE:</p> <p>11 Q. To your knowledge, has any attorney's fees been</p> <p>12 incurred to date?</p> <p>13 A. Yes.</p> <p>14 Q. How much?</p> <p>15 A. I don't know how much my attorneys bill. It's</p> <p>16 significant.</p> <p>17 Q. Have you ever received an invoice?</p> <p>18 A. I have, of course.</p> <p>19 Q. When did -- when was your last invoice?</p> <p>20 A. A monthly billing.</p> <p>21 Q. Do you pay monthly, or you're billed monthly?</p> <p>22 A. Oh, no, I pay monthly.</p> <p>23 Q. How much do you pay monthly?</p> <p>24 MR. LEYH: Objection, form.</p> <p>25 THE DEPONENT: I -- I don't recall. I have a lot</p>	

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69 to 72

<p style="text-align: right;">Page 69</p> <p>1 THE VIDEOGRAPHER: We're going back on the</p> <p>2 record at 12:33 p.m.</p> <p>3 BY MR. POPE:</p> <p>4 Q. All righty. What personal knowledge do you</p> <p>5 have that any of the named entity defendants are sham</p> <p>6 business entities?</p> <p>7 MR. LEYH: Objection. Form.</p> <p>8 THE DEPONENT: In reviewing the discovery,</p> <p>9 we've seen co-mingled assets. We've seen checks.</p> <p>10 BY MR. POPE:</p> <p>11 Q. You've personally seen?</p> <p>12 A. In the discovery, yes. I personally reviewed</p> <p>13 some of the discovery, and we've seen asset transfers.</p> <p>14 We've seen agency agreements where an agent is being</p> <p>15 purported to hold something in a concealed way for the</p> <p>16 benefit of Mr. Choudhri. We've seen assets being</p> <p>17 retained after a purported foreclosure.</p> <p>18 So that's the basis of my knowledge.</p> <p>19 Q. And which of the business entity named</p> <p>20 defendants do you have personal knowledge that it is a</p> <p>21 sham business entity?</p> <p>22 I think you answered that question.</p> <p>23 MR. LEYH: Objection. Form.</p> <p>24 THE DEPONENT: Counsel, I think it is a</p> <p>25 document intensive case. It is in the documents. I</p>	<p style="text-align: right;">Page 71</p> <p>1 Q. All right. Another statement of fact from the</p> <p>2 complaint do you have any personal evidence of any</p> <p>3 co-mingling of funds between the defendant entities?</p> <p>4 A. Yes, Choudhri issues -- Mr. Choudhri issues</p> <p>5 checks.</p> <p>6 MR. POPE: Objection.</p> <p>7 BY MR. POPE:</p> <p>8 Q. However, when you say Mr. Choudhri, in regard</p> <p>9 to which entity or in his individual capacity because my</p> <p>10 question is regarding the entity.</p> <p>11 A. Yeah, I -- I believe the evidence shows that</p> <p>12 he issues checks between entities, one entity to</p> <p>13 another, to pay for personal obligations.</p> <p>14 MR. POPE: Okay. Objection. Nonresponsive.</p> <p>15 BY MR. POPE:</p> <p>16 Q. Do you have any personal knowledge of any of</p> <p>17 the named entity defendants co-mingling funds?</p> <p>18 MR. LEYH: Objection. Form.</p> <p>19 THE DEPONENT: I believe it's in our</p> <p>20 discovery, yes.</p> <p>21 BY MR. POPE:</p> <p>22 Q. You believe you have personal knowledge?</p> <p>23 A. I do. Yes.</p> <p>24 Q. Okay. What personal knowledge do you have of</p> <p>25 the named entity defendants?</p>
<p style="text-align: right;">Page 70</p> <p>1 don't -- I don't have it in front of me sitting here</p> <p>2 today.</p> <p>3 BY MR. POPE:</p> <p>4 Q. So you have no personal knowledge of which</p> <p>5 business entity that's a named defendant you believe to</p> <p>6 be a sham?</p> <p>7 MR. LEYH: Objection. Form.</p> <p>8 THE DEPONENT: I don't have a specific entity</p> <p>9 that I can name right now sitting here right now.</p> <p>10 BY MR. POPE:</p> <p>11 Q. Okay.</p> <p>12 MR. POPE: What's the basis of your objection?</p> <p>13 MR. LEYH: I'm sorry.</p> <p>14 MR. POPE: What was the basis of your</p> <p>15 objection?</p> <p>16 MR. LEYH: Relevance.</p> <p>17 MR. POPE: It's on page 5 of your complaint</p> <p>18 that there's a belief that these are sham -- quote,</p> <p>19 unquote, sham business entities, which I think is very</p> <p>20 relevant that we ask the question regarding sham</p> <p>21 business entities that's on page 5 of the complaint.</p> <p>22 MR. LEYH: Well, calls for a legal conclusion.</p> <p>23 MR. POPE: It's in the preliminary statement</p> <p>24 fact section.</p> <p>25 BY MR. POPE:</p>	<p style="text-align: right;">Page 72</p> <p>1 A. Again, we have thousands of documents that</p> <p>2 show various transfers from banks to various entities,</p> <p>3 checks.</p> <p>4 Q. Which?</p> <p>5 A. I don't -- I can't tell you which one. I</p> <p>6 can't tell you which one specifically, but I believe the</p> <p>7 documents show that there's been multiple incidents of</p> <p>8 co-mingling of funds.</p> <p>9 Q. Do you have any -- what personal knowledge do</p> <p>10 you have that any of these instances are improper</p> <p>11 co-mingling that you referenced that you've seen in the</p> <p>12 discovery?</p> <p>13 MR. LEYH: Objection. Form.</p> <p>14 MR. POPE: What's the basis of your objection?</p> <p>15 MR. LEYH: Calls for a legal conclusion.</p> <p>16 MR. POPE: In what way?</p> <p>17 MR. BALLASES: We argue those objections in</p> <p>18 front of the judge.</p> <p>19</p> <p>20 MR. POPE: Is that Mr. Leyh's response?</p> <p>21 MR. BALLASES: No, he's engaging in improper</p> <p>22 tactics in the middle of deposition. I'm just reminding</p> <p>23 him of the rules.</p> <p>24 MS. MACGEORGE: Well, you have a lawyer</p> <p>25 representing the client that's responsible for making</p>

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73 to 76

<p style="text-align: right;">Page 73</p> <p>1 those objections. We all agreed on the record that only</p> <p>2 one lawyer would be doing it.</p> <p>3 THE REPORTER: Counsel.</p> <p>4 MR. BALLASES: So I understand. I wasn't</p> <p>5 making an objection. I was merely telling him the time</p> <p>6 to argue about the basis of it --</p> <p>7 MR. KIRKLIN: We're allowed --</p> <p>8 MR. BALLASES: I'm not talking to you.</p> <p>9 MR. KIRKLIN: Well, I'm talking to you.</p> <p>10 MR. BALLASES: So the basis to argue that</p> <p>11 objection --</p> <p>12 MR. KIRKLIN: We're allowed to talk.</p> <p>13 MR. BALLASES: -- is in front of the judge,</p> <p>14 not in the deposition.</p> <p>15 MS. MACGEORGE: Okay. And Mr. Leyh is</p> <p>16 certainly able to raise that. He's a competent lawyer,</p> <p>17 and he can raise that argument.</p> <p>18 MR. BALLASES: Mr. Leyh, when should we argue</p> <p>19 over the basis of an objection?</p> <p>20 MR. LEYH: When we get in front of a judge</p> <p>21 because I don't really care about these people's opinion</p> <p>22 so.</p> <p>23 MR. KIRKLIN: Are we on the record?</p> <p>24 BY MR. POPE:</p> <p>25 Q. What personal knowledge -- I'm going back to</p>	<p style="text-align: right;">Page 75</p> <p>1 A. I think I saw that his mother's IRS debt was</p> <p>2 paid from a corporate check.</p> <p>3 Q. Which corporation?</p> <p>4 A. Jetall Companies.</p> <p>5 Q. Was that a corporate debt or his mom's debt?</p> <p>6 A. His mom's debt.</p> <p>7 Q. Okay. So what personal knowledge do you have</p> <p>8 of any alleged corporate debts being paid with a</p> <p>9 personal check?</p> <p>10 A. I don't have specific knowledge of that, but,</p> <p>11 again, I haven't reviewed -- this is very document</p> <p>12 intensive. I believe the documents will show that.</p> <p>13 Q. So you have no personal knowledge of that?</p> <p>14 A. Not if I don't have the documents in front of</p> <p>15 me to review them.</p> <p>16 Q. So what personal knowledge do you have of any</p> <p>17 representations by any individual being financially</p> <p>18 backed by a corporation?</p> <p>19 A. I'm sorry. Can you repeat the question? I</p> <p>20 don't understand that question.</p> <p>21 Q. Okay. I'm going to read from page 9 of your</p> <p>22 complaint.</p> <p>23 A. Okay.</p> <p>24 Q. Quote, unquote, representations that the</p> <p>25 individual will financially back the corporation. What</p>
<p style="text-align: right;">Page 74</p> <p>1 the question.</p> <p>2 What personal knowledge do you have that any</p> <p>3 of the instances you've seen in the discovery are</p> <p>4 improper co-mingling of funds?</p> <p>5 MR. LEYH: Objection. Asked and answered.</p> <p>6 THE DEPONENT: Yeah, I will -- I think I</p> <p>7 answered the question previously, but the various bank</p> <p>8 accounts from the various entities that we've seen show</p> <p>9 money going back and forth in some cases for personal</p> <p>10 obligations not related to the entity.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Going back and forth between whom?</p> <p>13 A. Between Ali Choudhri, his mother, the various</p> <p>14 entities, Jetall Companies. It's like an ATM machine</p> <p>15 for the family.</p> <p>16 Q. But how do you know that the transfer is</p> <p>17 improper?</p> <p>18 A. Good faith basis.</p> <p>19 Q. Based on what?</p> <p>20 A. Based on his pattern of committing fraud.</p> <p>21 Q. What personal knowledge do you have of any</p> <p>22 alleged corporate debts being paid with personal checks?</p> <p>23 A. I believe the discovery will show that his</p> <p>24 personal debts are paid with corporate funds.</p> <p>25 Q. What personal knowledge do you have?</p>	<p style="text-align: right;">Page 76</p> <p>1 personal knowledge do you have that supports that</p> <p>2 statement?</p> <p>3 A. I think Mr. Choudhri has stated in depositions</p> <p>4 that's the corporation and the corporation is him.</p> <p>5 Q. Were you present at the deposition?</p> <p>6 A. I was not.</p> <p>7 Q. What personal knowledge do you have that</p> <p>8 supports that statement?</p> <p>9 A. I've read deposition transcripts.</p> <p>10 Q. Which deposition transcript?</p> <p>11 A. I'm not sure which ones to be honest.</p> <p>12 Q. Read another statement. The diversion of</p> <p>13 company profits to the individual for his personal use.</p> <p>14 What personal knowledge do you have that supports that</p> <p>15 statement?</p> <p>16 MR. LEYH: Objection. Form.</p> <p>17 THE DEPONENT: I think the --</p> <p>18 MR. POPE: What's the basis of your objection?</p> <p>19 What's the basis of the objection?</p> <p>20 MR. LEYH: I think it calls for a legal</p> <p>21 conclusion.</p> <p>22 MR. POPE: I'm reading from a statement of</p> <p>23 facts in the complaint.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Okay. I'll ask the question again.</p>

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77 to 80

<p style="text-align: right;">Page 77</p> <p>1 The statement is: The diversion of company 2 profits to the individual for his personal use. What 3 personal knowledge do you have of that statement? 4 MR. LEYH: Objection. Form. 5 THE DEPONENT: I believe the documents, the 6 discovery that we have will show that he uses corporate 7 debts -- corporate funds to pay for personal debts. 8 BY MR. POPE: 9 Q. But what personal knowledge do you have of 10 that statement? 11 A. I've looked at the discovery, but, again, I 12 don't have it in front of me. There's thousands of 13 documents in this case. 14 Q. So you do not have any personal knowledge that 15 supports the statement. 16 MR. LEYH: Objection. Form. 17 THE DEPONENT: Sitting here today, I don't 18 have any knowledge of a specific incident, but I believe 19 the discovery will show that he does. 20 BY MR. POPE: 21 Q. Okay. Another statement. Inadequate 22 capitalization. What personal knowledge do you have on 23 inadequate capitalization? 24 A. Again, I think the documents will show that he 25 states that an asset is worth a certain amount of money</p>	<p style="text-align: right;">Page 79</p> <p>1 A. Not sitting here today. No. 2 Q. Thank you. 3 Another statement. You referenced gaining or 4 reviewing discovery. Did you have any personal 5 knowledge of any of the facts alleged in your complaint 6 before the complaint was filed? 7 A. Yes. 8 Q. Okay. Did you review those bank statements 9 before or after the complaint was filed? 10 A. No, afterwards. 11 MR. LEYH: Objection. I don't understand that 12 reference. 13 MR. POPE: The question was: Did he review 14 the bank statements he referred to earlier before or 15 after the complaint was filed? 16 I think his answer was after. 17 THE DEPONENT: After. 18 BY MR. POPE: 19 Q. Right. Did you review the discovery you 20 referenced before or after the complaint was filed? 21 A. After. 22 Q. Did you review the corporate documents that 23 you referenced before or after the complaint was filed? 24 A. Unless they were public record, after. 25 Q. Another statement. Other failures to keep</p>
<p style="text-align: right;">Page 78</p> <p>1 when it isn't, or that it is worthless than what it is 2 in order to gain some kind of advantage. 3 Q. What personal knowledge do you have of that? 4 A. Public record. 5 Q. What public record? 6 A. I believe he's given testimony where he 7 inflated his personal financial statement in order to 8 obtain credit. And then another incident he showed 9 losses or showed less of a personal financial statement 10 in order to pay taxes. 11 Q. So your statement there is about Ali Choudhri. 12 But let's talk about Jetall Companies. What personal 13 knowledge do you have of inadequate capitalization of 14 Jetall Companies? 15 A. Again, I think the discovery will show that it 16 is. 17 Q. Do you have any personal knowledge of 18 inadequate capitalization of Jetall Companies? 19 A. Not sitting here today, no. 20 Q. Do you have any personal knowledge of any 21 inadequate capitalization of Arabella? 22 A. I do not. 23 Q. Do you have any personal knowledge of any 24 inadequate capitalization of Memorial, Kirby, any of the 25 other named entity defendants?</p>	<p style="text-align: right;">Page 80</p> <p>1 corporate and personal assets separate. What personal 2 knowledge do you have that supports that statement? 3 A. Again, I -- the documents show that he makes 4 personal payments out of corporate entities. 5 Q. What personal knowledge do you have that 6 supports this statement? 7 A. He gave testimony that he made mortgages from 8 a corporate entity. 9 Q. Which corporate entity? 10 A. I think it was Jetall Investment and Realty. 11 Q. What personal knowledge do you have for the 12 statement as it relates to the other named entity 13 defendants? 14 A. I don't know. 15 Q. So you have none? 16 A. It's in the discovery. 17 MR. LEYH: That's not what he said. 18 Objection. 19 BY MR. POPE: 20 Q. So what personal knowledge do you have that 21 supports this statement as it pertains to any of the 22 named entity defendants? 23 A. Sitting here right now, I don't have the 24 documents, the benefit of all the discovery in front of 25 me, but I believe the discovery will show that.</p>

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81 to 84

<p style="text-align: right;">Page 81</p> <p>1 Q. So do you have any personal knowledge that</p> <p>2 supports this statement as it pertains to the other</p> <p>3 named entity defendants?</p> <p>4 A. Sitting here right now, I do not.</p> <p>5 Q. Okay. At the time the complaint was filed,</p> <p>6 did you have personal knowledge at that time?</p> <p>7 A. Yes.</p> <p>8 Q. Based on?</p> <p>9 A. Personal knowledge of?</p> <p>10 Q. How this statement, other failures to keep</p> <p>11 corporate and personal assets separate?</p> <p>12 A. Yes.</p> <p>13 Q. As it pertained to the other named entity</p> <p>14 defendants?</p> <p>15 A. Again, public record shows that he co-mingles</p> <p>16 assets and does between entities.</p> <p>17 Q. Which public records?</p> <p>18 A. I mean there's various judgments against him</p> <p>19 out there prior to me obtaining one.</p> <p>20 Q. Okay. The other documents that you reference,</p> <p>21 bank statements, discovery. You made constant reference</p> <p>22 to discovery. Where did you get those documents?</p> <p>23 A. I believe via subpoena in this case.</p> <p>24 Q. From any person?</p> <p>25 A. From banks.</p>	<p style="text-align: right;">Page 83</p> <p>1 BY MR. POPE:</p> <p>2 Q. But who gave it to you?</p> <p>3 MR. LEYH: Objection.</p> <p>4 THE DEPONENT: Nobody.</p> <p>5 BY MR. POPE:</p> <p>6 Q. So how did you get it?</p> <p>7 A. I reviewed it with my attorneys.</p> <p>8 Q. How did your attorney get it?</p> <p>9 MR. LEYH: Objection.</p> <p>10 THE DEPONENT: That, I don't know. They're</p> <p>11 pretty good.</p> <p>12 BY MR. POPE:</p> <p>13 Q. The assignment of Nason's Galleria LLC and</p> <p>14 Nason's Capital Real Estate LTD attached to the unsworn</p> <p>15 declaration, how did you get that document?</p> <p>16</p> <p>17 MR. LEYH: Objection.</p> <p>18 THE DEPONENT: I don't know how my attorneys</p> <p>19 obtained it, but I rely on it.</p> <p>20 BY MR. POPE:</p> <p>21 Q. And when did you retain Hoover Slovacek to</p> <p>22 represent you in this case?</p> <p>23 MR. LEYH: Objection.</p> <p>24 THE DEPONENT: Prior to filing of the</p> <p>25 complaint.</p>
<p style="text-align: right;">Page 82</p> <p>1 Q. Only from banks?</p> <p>2 A. I believe so.</p> <p>3 Q. Did you get any document from any personal?</p> <p>4 MR. LEYH: Objection. Attorney/client</p> <p>5 privilege.</p> <p>6 BY MR. POPE:</p> <p>7 Q. Any documents attached to the complaint, did</p> <p>8 you get any of those from any person?</p> <p>9 A. I don't know. I think a human being would</p> <p>10 have had to have provided them to us.</p> <p>11 Q. Did Chris Wyatt provide you this statement?</p> <p>12 MR. LEYH: Objection. Form.</p> <p>13 BY MR. POPE:</p> <p>14 Q. The unsworn declaration of Christopher Wyatt,</p> <p>15 was that provided by Mr. Wyatt?</p> <p>16 A. I think the document speaks for itself.</p> <p>17 Q. Who drafted the unsworn declaration of</p> <p>18 Christopher Wyatt?</p> <p>19 MR. LEYH: Objection.</p> <p>20 THE DEPONENT: I have no knowledge of that.</p> <p>21 BY MR. POPE:</p> <p>22 Q. Who gave it to you?</p> <p>23 MR. LEYH: Objection.</p> <p>24 THE DEPONENT: I reviewed it with my</p> <p>25 attorneys.</p>	<p style="text-align: right;">Page 84</p> <p>1 BY MR. POPE:</p> <p>2 Q. What year?</p> <p>3 MR. LEYH: Objection.</p> <p>4 THE DEPONENT: Maybe 2021. I'm not sure.</p> <p>5 2022. I don't recall specifically. It's been awhile.</p> <p>6 BY MR. POPE:</p> <p>7 Q. Do you have assigned engagement agreement with</p> <p>8 Hoover Slovacek?</p> <p>9 A. I'm sure we do.</p> <p>10 Q. How much did you pay for the judgment entered</p> <p>11 in 201341273 to be assign to you?</p> <p>12 MR. LEYH: Objection. Form.</p> <p>13 THE DEPONENT: The documents that we filed</p> <p>14 speaks for itself. I don't know how much I paid for it.</p> <p>15 BY MR. POPE:</p> <p>16 Q. Okay. Do you know how much you paid to have</p> <p>17 the judgment entered in 201710832 assigned to you?</p> <p>18 A. I don't know.</p> <p>19 MR. LEYH: Objection. Form.</p> <p>20 THE DEPONENT: But I believe -- I don't know</p> <p>21 how much I paid, but I believe we have an offer of</p> <p>22 payoff for Mr. Choudhri.</p> <p>23 BY MR. POPE:</p> <p>24 Q. How much is it?</p> <p>25 A. I think it's 1.2 million.</p>

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85 to 88

<p style="text-align: right;">Page 85</p> <p>1 Q. What's the basis of that number?</p> <p>2 A. Whatever is in the documents that we provided.</p> <p>3 Q. The document didn't -- did the document</p> <p>4 provide a breakdown of the number?</p> <p>5 A. I believe so.</p> <p>6 Q. How much did you pay for the assignment of the</p> <p>7 judgment in 202038738?</p> <p>8 MR. LEYH: Objection. Form.</p> <p>9 THE DEPONENT: I'm not sure.</p> <p>10 MR. POPE: What's the basis of the objection?</p> <p>11 MR. LEYH: Best evidence. And the order of --</p> <p>12 best evidence and order from Judge Norman from June</p> <p>13 20th, 2024.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Did you pay anything for the judgments?</p> <p>16 A. Yes.</p> <p>17 Q. Do you have any idea how much you paid for</p> <p>18 these judgments?</p> <p>19 MR. LEYH: Objection. Form.</p> <p>20 THE DEPONENT: I don't know how much we paid.</p> <p>21 We paid a substantial amount of money for these</p> <p>22 judgments.</p> <p>23 BY MR. POPE:</p> <p>24 Q. When you say we, who is the we that you</p> <p>25 reference?</p>	<p style="text-align: right;">Page 87</p> <p>1 that in front of me.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Do you often make payments from your corporate</p> <p>4 account for assets that you obtained individually?</p> <p>5 A. I think it depends on my accounting. Like if</p> <p>6 my accountant advises me to do something, then I would</p> <p>7 do that.</p> <p>8 Q. Would that create an alter ego situation for</p> <p>9 you?</p> <p>10 A. I don't think so.</p> <p>11 Q. So you don't believe that the mere use of</p> <p>12 corporate funds for personal gains creates an alter ego</p> <p>13 situation?</p> <p>14 A. You're asking me to make a legal conclusion,</p> <p>15 and I don't have the statute in front of me.</p> <p>16 Q. Were you involved in any transfer of funds</p> <p>17 listed in your complaint or any of its exhibits?</p> <p>18 MR. LEYH: Objection. Form. I don't even</p> <p>19 understand that question.</p> <p>20 BY MR. POPE:</p> <p>21 Q. You can still answer.</p> <p>22 A. I'm not sure what the question is. It sounded</p> <p>23 compound.</p> <p>24 Q. There are transfers that -- you're complaint</p> <p>25 references different transfers made within the entities,</p>
<p style="text-align: right;">Page 86</p> <p>1 A. Myself and the other judgment creditors.</p> <p>2 Q. Who are?</p> <p>3 A. Osama Abdullatif and John Quinlan.</p> <p>4 Q. Did you all split the payment equally?</p> <p>5 A. I think so.</p> <p>6 MR. LEYH: Object --</p> <p>7 THE DEPONENT: Sorry.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Did you make the payment by wire transfer or</p> <p>10 check or cash?</p> <p>11 MR. LEYH: Objection. Form.</p> <p>12 THE DEPONENT: I don't know that question.</p> <p>13 Not cash.</p> <p>14 BY MR. POPE:</p> <p>15 Q. You said not cash?</p> <p>16 A. Yeah.</p> <p>17 Q. On what account would that transfer have been</p> <p>18 made?</p> <p>19 MR. LEYH: Objection. Form.</p> <p>20 THE DEPONENT: I wouldn't know. Maybe my</p> <p>21 corporate account.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Which corporate account?</p> <p>24 MR. LEYH: Objection. Form.</p> <p>25 THE DEPONENT: I'm not sure. I don't have</p>	<p style="text-align: right;">Page 88</p> <p>1 correct?</p> <p>2 A. Yes.</p> <p>3 Q. Were you a party to any of those transfers?</p> <p>4 MR. LEYH: Objection. Form.</p> <p>5 THE DEPONENT: I don't think so.</p> <p>6 BY MR. POPE:</p> <p>7 Q. Did you receive any of the monies that are</p> <p>8 involved in those transfers? Did you give any of the</p> <p>9 money --</p> <p>10 A. No.</p> <p>11 Q. -- that were involved in those transfers? Did</p> <p>12 any of your entities?</p> <p>13 A. I don't think so.</p> <p>14 Q. Is there going to be a transaction from any of</p> <p>15 your entities on any of those bank statements that are</p> <p>16 part of your discovery?</p> <p>17 A. No.</p> <p>18 MR. LEYH: Objection. Form.</p> <p>19 BY MR. POPE:</p> <p>20 Q. Do you have any personal knowledge of Jetall</p> <p>21 paying any real property taxes for Memorial?</p> <p>22 A. I think it's -- I'm not sure if it's specific.</p> <p>23 Again, document intensive case. I don't know, but he</p> <p>24 co-mingles assets so it's quite possible.</p> <p>25 Q. Do you have any personal knowledge?</p>

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89 to 92

<p style="text-align: right;">Page 89</p> <p>1 A. I don't.</p> <p>2 Q. Do you have any personal knowledge that Jetall</p> <p>3 paid any real property tax for any property owned by</p> <p>4 Kirby?</p> <p>5 MR. LEYH: Owned by who?</p> <p>6 MR. POPE: Kirby?</p> <p>7 THE DEPONENT: I don't know.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Okay. Again, reading from the complaint.</p> <p>10 Jetall paid the -- do you have any personal knowledge of</p> <p>11 any real property taxes paid by Jetall for any property</p> <p>12 owned by Arabella?</p> <p>13 A. If it's in our complaint, then I believe that</p> <p>14 we have determined either based on public record or some</p> <p>15 other evidence, but I don't have it sitting here in</p> <p>16 front of me. I don't have the complaint in front of me.</p> <p>17 Q. Do you have any personal knowledge?</p> <p>18 A. If it's in our complaint, at some point I did</p> <p>19 when I reviewed the complaint.</p> <p>20 Q. Before or after the complaint was drafted?</p> <p>21 A. Before.</p> <p>22 Q. Okay. What did you review before the</p> <p>23 complaint was drafted?</p> <p>24 A. Public record.</p> <p>25 Q. Which public record?</p>	<p style="text-align: right;">Page 91</p> <p>1 knowledge do you have that their property taxes were</p> <p>2 paid by another entity other than themselves?</p> <p>3 MR. LEYH: Objection. Form.</p> <p>4 MR. POPE: What's the basis of your objection?</p> <p>5 MR. LEYH: I couldn't even understand the</p> <p>6 question.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Okay. Do you have any personal knowledge that</p> <p>9 real property taxes for real property owned by Kirby was</p> <p>10 paid by someone other than Kirby, some entity or person</p> <p>11 other than Kirby?</p> <p>12 A. I don't specifically.</p> <p>13 Q. Okay. Do you have any personal knowledge that</p> <p>14 any real property taxes owned by property for real</p> <p>15 property owned by Memorial was paid by any entity other</p> <p>16 than Memorial?</p> <p>17 A. I don't.</p> <p>18 Q. Do you have any personal knowledge that any</p> <p>19 real property taxes for real property owned by Kirby was</p> <p>20 paid by any entity other than Kirby?</p> <p>21 A. I don't know if he paid those taxes. He</p> <p>22 defaulted on everything.</p> <p>23 Q. I'm talking about Kirby?</p> <p>24 A. He defaulted on that.</p> <p>25 Q. I'm not talking about Mr. Choudhri</p>
<p style="text-align: right;">Page 90</p> <p>1 A. The various, you know, dozens of cases that</p> <p>2 have been filed against your client.</p> <p>3 Q. Proof of payment of taxes would be in one of</p> <p>4 the dozens of cases filed against the client?</p> <p>5 A. I would believe so, yes.</p> <p>6 Q. Which case?</p> <p>7 A. I'm not sure which case sitting here today.</p> <p>8 Q. Which cases did you review?</p> <p>9 A. Everything in the Harris County District</p> <p>10 Court.</p> <p>11 Q. Which cases were those?</p> <p>12 A. I mean, they go back to 2009 or '10.</p> <p>13 MR. LEYH: Objection. Form.</p> <p>14 THE DEPONENT: There's dozens of them.</p> <p>15 BY MR. POPE:</p> <p>16 Q. So you've read the docket reports for all the</p> <p>17 dozens of cases that you referenced?</p> <p>18 A. Most of them for sure.</p> <p>19 Q. Which ones?</p> <p>20 A. Everything going back from 2008 to now.</p> <p>21 Q. And you've read all the pleadings in each of</p> <p>22 those cases?</p> <p>23 A. Most likely, yes.</p> <p>24 Q. Okay. What about the other named defendants</p> <p>25 that weren't in those complaints? What personal</p>	<p style="text-align: right;">Page 92</p> <p>1 individually. I'm talking about Kirby.</p> <p>2 A. Whoever the Kirby is is defaulted on their</p> <p>3 payments.</p> <p>4 Q. On which payments?</p> <p>5 A. Their own payments.</p> <p>6 Q. I'm talking about real property taxes?</p> <p>7 A. I'm not -- I'm assuming if they didn't pay the</p> <p>8 loan payments, they didn't pay property taxes. I could</p> <p>9 be wrong.</p> <p>10 Q. Okay. So do you have any personal knowledge</p> <p>11 that any real property taxes for real property owned by</p> <p>12 Kirby was not paid by Kirby?</p> <p>13 A. Other than what's in our complaint in</p> <p>14 evidence, no.</p> <p>15 Q. So do you have any personal knowledge?</p> <p>16 A. I don't know if I did have it at one point.</p> <p>17 Based on our complaint, I would have -- I don't have it</p> <p>18 sitting here today.</p> <p>19 Q. So as you sit here today, do you have personal</p> <p>20 knowledge?</p> <p>21 A. No.</p> <p>22 Q. As you sit here today, do you have personal</p> <p>23 knowledge that any of the real property taxes paid for</p> <p>24 any of the named entity defendants was paid by anyone</p> <p>25 other than those named defendants?</p>

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93 to 96

<p style="text-align: right;">Page 93</p> <p>1 A. I know it's a pattern and practice of what he 2 does. 3 Q. Do you have personal knowledge that that 4 happened? 5 A. Not specifically, no. 6 Q. It's 12:58. Are you opposed to breaking for 7 lunch? 8 A. I'd like to finish up, keep going. 9 Q. You'd like to keep going? 10 MR. KIRKLIN: It's not all up to him. 11 MS. MACGEORGE: Yeah, I'd -- 12 MR. BALLASES: He's got two days pursuant to 13 the court order. So use them how you want. If you all 14 want to take a break, great. You all want to keep 15 going, we keep going. 16 MR. POPE: Be back in an hour. 17 THE VIDEOGRAPHER: All parties in agreement 18 going off the record? 19 MR. POPE: Yes. 20 THE VIDEOGRAPHER: We're going off the record 21 at 12:48 p.m. 22 (WHEREUPON, a recess was taken.) 23 THE VIDEOGRAPHER: We're going back on the 24 record at 2:06 p.m. 25 BY MR. POPE:</p>	<p style="text-align: right;">Page 95</p> <p>1 evading judgments, creditors like myself. So there is 2 no practical difference between them. 3 Q. You don't think there is a practical 4 difference between Ali Choudhri and Shahnaz Choudhri? 5 A. That's correct. 6 Q. And you base that on what? 7 A. So far from what I've seen from bank accounts. 8 Q. And what have you seen in bank accounts? 9 A. Both of them on the same bank accounts. Her 10 debts being paid by entities controlled by him and vice 11 versa. 12 Q. So you believe that Ali Choudhri is a 13 puppeteer controlling Shahnaz Choudhri? 14 A. Yes. 15 Q. You believe Shahnaz Choudhri is a business 16 entity or westbound of business entities? 17 MR. BALLASES: Objection. Form. 18 THE DEPONENT: I don't know what she is. 19 That's speculation on what I, you know, I can only look 20 at what's been produced in discovery and that's what 21 we've been able to obtain because neither your client 22 nor Mrs. Choudhri has provided any discovery to us. 23 BY MR. POPE: 24 Q. So all your knowledge about the allegations 25 here came from discovery items you obtained --</p>
<p style="text-align: right;">Page 94</p> <p>1 Q. All righty. Mr. Khawaja, so the -- in this 2 lawsuit you're attempting to collect on the three 3 judgments that's listed in the complaint, correct? 4 A. That's correct. 5 Q. But isn't it true that one of these 6 complaints, one of these judgment is has already been 7 superseded? 8 A. I'm not aware of that. 9 Q. You're not aware that in case number 202038738 10 that judgment was superseded? 11 MR. BALLASES: Objection. Form. 12 THE DEPONENT: I have no knowledge of that. 13 BY MR. POPE: 14 Q. Are you aware that any of the judgments are on 15 appeal? 16 A. I'm not aware of that, no. 17 Q. But you are alleging alter ego in this 18 proceeding against Mr. Choudhri and his mother Shahnaz 19 Choudhri, correct? 20 A. Yes. 21 Q. Okay. And what personal knowledge do you have 22 that Mrs. Choudhri intentionally acted in a manner to 23 defraud her creditors? 24 A. Well, Mrs. Choudhri is the same as 25 Mr. Choudhri for purposes of defrauding creditors or</p>	<p style="text-align: right;">Page 96</p> <p>1 MR. BALLASES: Objection. 2 BY MR. POPE: 3 Q. -- before the complaint? 4 MR. BALLASES: Objection. Form. 5 THE DEPONENT: Yes. That's correct. 6 BY MR. POPE: 7 Q. That's correct. 8 A. And public record. Sorry. And public record. 9 Q. And you didn't have access to any of that 10 discovery prior to filing of the petition, correct? 11 A. Well, the public record information, we did. 12 And some of the discovery -- strike that. The public 13 record information we had access to. 14 Q. You did not have access though to the bank 15 records, correct? 16 A. No, I did not. 17 Q. And it's the bank records that has the 18 transfer you're complaining of, correct? 19 MR. BALLASES: Objection. Form. 20 THE DEPONENT: I believe so. There might be 21 something beyond that, as well. 22 MR. POPE: What's the basis of the objection? 23 MR. BALLASES: Vague, ambiguous, confusing, 24 overly broad, misleading. Take your pick. 25 BY MR. POPE:</p>

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97 to 100

<p style="text-align: right;">Page 97</p> <p>1 Q. What personal knowledge do you have that</p> <p>2 Shahnaz Choudhri has a sham business entity that she</p> <p>3 owns?</p> <p>4 A. Again, I'm going to refer you back to bank</p> <p>5 records, her involvement in, you know, being a member of</p> <p>6 multiple entities that Mr. Choudhri's involved in.</p> <p>7 Q. So you don't have any personal knowledge, do</p> <p>8 you?</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 THE DEPONENT: I think that qualifies as</p> <p>11 personal knowledge.</p> <p>12 BY MR. POPE:</p> <p>13 Q. You think what qualifies as personal</p> <p>14 knowledge?</p> <p>15 A. The review of bank records that has her listed</p> <p>16 as an account holder on entities that Mr. Choudhri</p> <p>17 controls.</p> <p>18 Q. What personal knowledge did you have before</p> <p>19 the complaint was filed?</p> <p>20 A. Before the complaint was filed, I had personal</p> <p>21 knowledge that she defrauded my friend.</p> <p>22 Q. What's your friend?</p> <p>23 A. Mr. Abdullatif with an entity called AIG WF</p> <p>24 where Mr. Choudhri and Mrs. Choudhri both conspired to</p> <p>25 defraud him out of his earnest money.</p>	<p style="text-align: right;">Page 99</p> <p>1 A. Not to my knowledge.</p> <p>2 Q. Why is that answer different, not to my</p> <p>3 knowledge, and not just no?</p> <p>4 A. I just don't have the case number in front of</p> <p>5 me so I'm relying on what you're telling me.</p> <p>6 Q. Did you have the other case numbers in front</p> <p>7 of you?</p> <p>8 A. I didn't.</p> <p>9 Q. Okay.</p> <p>10 A. I just didn't want you to slip in a case where</p> <p>11 she was a defendant.</p> <p>12 Q. Gotcha. What personal knowledge do you have</p> <p>13 of any intentional acts Miss Shahnaz Choudhri made to</p> <p>14 defraud you?</p> <p>15 A. Well, she's an alter ego of Ali Choudhri so</p> <p>16 any assets that he's hiding behind her with her on them</p> <p>17 is an attempt to defraud any judgment creditor, myself</p> <p>18 included.</p> <p>19 Q. Again, there's been no finding of alter ego</p> <p>20 yet, correct?</p> <p>21 A. Correct. But there's plenty of discovery that</p> <p>22 shows that he's hiding assets with his mother.</p> <p>23 Q. Do you have any personal knowledge of any</p> <p>24 intentional acts of Miss Shahnaz Choudhri absent your</p> <p>25 theory of alter ego?</p>
<p style="text-align: right;">Page 98</p> <p>1 Q. And you were present when that happened?</p> <p>2 A. I wasn't present. I was told about it.</p> <p>3 Q. You were told about it from who?</p> <p>4 A. Mr. Abdullatif.</p> <p>5 Q. When?</p> <p>6 A. I'm sure around the time we met, 2013, 2014.</p> <p>7 Q. How much earnest money are we talking about?</p> <p>8 A. Millions of dollars. Maybe two million.</p> <p>9 Q. Of the three judgments named in the complaint,</p> <p>10 are any of them against Miss Shahnaz Choudhri?</p> <p>11 A. Well, if she's alter ego, then I would say</p> <p>12 yes.</p> <p>13 Q. Has there been a finding of alter ego in this</p> <p>14 case here?</p> <p>15 A. Not yet.</p> <p>16 Q. Okay.</p> <p>17 A. Hopefully soon.</p> <p>18 Q. So in case number 201341273, was Miss Shahnaz</p> <p>19 Choudhri a named defendant?</p> <p>20 A. No.</p> <p>21 Q. In case number 201710832, was Miss Shahnaz</p> <p>22 Choudhri a named defendant?</p> <p>23 A. No.</p> <p>24 Q. In case number 202038738, was Miss Shahnaz</p> <p>25 Choudhri a named defendant?</p>	<p style="text-align: right;">Page 100</p> <p>1 A. Personal acts so, yes, I do because she has</p> <p>2 taken proceeds from various entities that we've obtained</p> <p>3 in discovery for her benefit, and entities have been</p> <p>4 transferred under her control.</p> <p>5 Q. Which entities?</p> <p>6 A. I think Otisco rDX, various entities. Again,</p> <p>7 I don't have them in front of me, but this is not --</p> <p>8 this is a pattern of behavior. This isn't a one or two</p> <p>9 instance.</p> <p>10 Q. She has a pattern of behavior with you</p> <p>11 personally?</p> <p>12 A. With Mr. Choudhri, not with me.</p> <p>13 Q. Have you had any personal dealings with</p> <p>14 Miss Shahnaz Choudhri?</p> <p>15 A. I think she came over once when we had a</p> <p>16 previous lawsuit and she tried to imply that we</p> <p>17 shouldn't be suing her son, something along those lines.</p> <p>18 Q. She came over where?</p> <p>19 A. To my home, to my parents' home.</p> <p>20 Q. To your parents' home.</p> <p>21 A. So she's very involved in his business.</p> <p>22 Q. So as you sit here today, you believe Ali</p> <p>23 Choudhri controls Shahnaz Choudhri?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: Yes.</p>

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101 to 104

<p style="text-align: right;">Page 101</p> <p>1 BY MR. POPE:</p> <p>2 Q. What evidence do you have of that?</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 THE DEPONENT: Everything I've stated</p> <p>5 previously and what we've obtained in discovery so far</p> <p>6 and I think we're waiting on her deposition.</p> <p>7 BY MR. POPE:</p> <p>8 Q. When have you personally seen Ali Choudhri</p> <p>9 control Shahnaz Choudhri?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: She came to court with him many</p> <p>12 times.</p> <p>13 BY MR. POPE:</p> <p>14 Q. She came to court with him several times?</p> <p>15 A. Several times.</p> <p>16 Q. And you have personal knowledge that he</p> <p>17 controlled her while in court?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: I don't have personal knowledge</p> <p>20 of that.</p> <p>21 BY MR. POPE:</p> <p>22 Q. Do you have any personal knowledge -- have you</p> <p>23 ever seen Ali Choudhri control Shahnaz Choudhri?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: Control is very vague and</p>	<p style="text-align: right;">Page 103</p> <p>1 A. Again, I don't have the discovery in front of</p> <p>2 me. This is a document intensive case. I would have to</p> <p>3 have that in front of me to be able to point out, hey,</p> <p>4 this piece of property that's in her name is really his,</p> <p>5 but I don't have that in front of me.</p> <p>6 Q. Which bank accounts?</p> <p>7 A. Same thing. I don't have the discovery in</p> <p>8 front of me, but there's bank accounts that have her</p> <p>9 name, his name. Checks going out to various entities</p> <p>10 under his control.</p> <p>11 Q. But you base your knowledge on discovery,</p> <p>12 correct?</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 THE DEPONENT: I mean, discovery and whatever</p> <p>15 information I've encountered over the years.</p> <p>16 BY MR. POPE:</p> <p>17 Q. What information have you encountered over the</p> <p>18 years that would support an assertion that Shahnaz</p> <p>19 Choudhri fraudulently made -- made fraudulent transfers</p> <p>20 to prevent creditors, her creditors, from collecting?</p> <p>21 A. I will -- to make -- sorry. Made an attempt</p> <p>22 to -- I'm sorry. Can you repeat that.</p> <p>23 Q. What personal knowledge do you have of any</p> <p>24 fraudulent transfers made by Shahnaz Choudhri to prevent</p> <p>25 her own creditors from collecting?</p>
<p style="text-align: right;">Page 102</p> <p>1 ambiguous. You need to explain what you mean by that.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Control's --</p> <p>4 A. I mean, have I seen him write her a check</p> <p>5 personally? No. But I've seen bank accounts that show</p> <p>6 entities giving or distributing proceeds and funds to</p> <p>7 her and vice versa.</p> <p>8 Q. And you saw that happen where? On what</p> <p>9 document?</p> <p>10 A. In this case in the discovery we obtained.</p> <p>11 Q. What evidence do you have? What personal</p> <p>12 knowledge do you have of mom's attempt to defraud --</p> <p>13 mom's -- Miss Shahnaz Choudhri's attempt to defraud her</p> <p>14 own creditor?</p> <p>15 A. Well, she's hiding assets for her son. Then</p> <p>16 she's helping her son evade judgment creditors.</p> <p>17 Q. Are they her judgment creditors or her son's</p> <p>18 judgment creditors?</p> <p>19 A. Same question?</p> <p>20 Q. Yes. Her creditors or her son's creditors?</p> <p>21 A. I they are his creditors are her creditors as</p> <p>22 a result of him hiding assets with her.</p> <p>23 Q. And what assets do you believe she's hiding?</p> <p>24 A. Real estate, bank accounts, you know.</p> <p>25 Q. What real estate?</p>	<p style="text-align: right;">Page 104</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: Well, I mean, I don't have any</p> <p>3 personal knowledge specifically beyond what we've</p> <p>4 obtained in discovery which shows money going to and</p> <p>5 from her from various Choudhri affiliated entities.</p> <p>6 BY MR. POPE:</p> <p>7 Q. What personal knowledge did you have before</p> <p>8 the complaint was filed that Shahnaz Choudhri made any</p> <p>9 effort to conceal any assets?</p> <p>10 A. Conceal assets. So --</p> <p>11 Q. Before the complaint was filed.</p> <p>12 A. Before the complaint was filed, I mean,</p> <p>13 there's entities that have her name on them that</p> <p>14 Choudhri claims to own, you know. Things I've seen in</p> <p>15 the public record.</p> <p>16 Q. Which entities are those?</p> <p>17 A. I think are Otisco rDX is one. I think she</p> <p>18 was a manager of Jetall Companies at one point. She's</p> <p>19 part of AIG WT, you know. So there's plenty of evidence</p> <p>20 there. And then the discovery that we obtained so far</p> <p>21 shows that that was -- there was a good reason for the</p> <p>22 good faith opinion that she was hiding assets for him.</p> <p>23 Q. What evidence did you have, what personal</p> <p>24 knowledge did you have before the complaint was filed of</p> <p>25 any agency agreements between Shahnaz Choudhri and any</p>

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<p style="text-align: right;">Page 105</p> <p>1 third party?</p> <p>2 A. Again, I don't know if I'd -- have that</p> <p>3 agreement in front of me. I don't know if I've seen</p> <p>4 that agreement, but I vaguely recall some agreement that</p> <p>5 has -- maybe it wasn't between Ali and Shahnaz. I'm not</p> <p>6 sure.</p> <p>7 Q. So you don't know of any agency agreements?</p> <p>8 A. I don't know.</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 THE DEPONENT: I don't know.</p> <p>11 BY MR. POPE:</p> <p>12 Q. What personal knowledge do you have of Mrs.</p> <p>13 Shahnaz Choudhri attempts to hide Mr. Ali Choudhri's</p> <p>14 involvement in any transaction?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: Again, money going to and from</p> <p>17 her account.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Before -- did you have any knowledge of that</p> <p>20 before the complaint was filed, personal knowledge?</p> <p>21 A. Personal knowledge, I mean, like I said,</p> <p>22 Mr. Abdullatif told me how she helped defraud him out of</p> <p>23 money with AIG WT. She is part of Jetall's corporate</p> <p>24 structure or was at some point, various bank accounts.</p> <p>25 She's been part of the business from day one. This</p>	<p style="text-align: right;">Page 107</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: I don't think -- I'm not sure.</p> <p>3 We probably had a faith reason to believe that she was</p> <p>4 hiding assets for her son.</p> <p>5 BY MR. POPE:</p> <p>6 Q. Based on what before the complaint was filed?</p> <p>7 A. Based on her involvement with his business.</p> <p>8 Q. Were you aware of her involvement with any</p> <p>9 businesses before the complaint was filed?</p> <p>10 A. Yes. Absolutely.</p> <p>11 Q. How did you obtain that awareness?</p> <p>12 A. In my dealings with Jetall over the years and</p> <p>13 my knowledge of litigation against Ali.</p> <p>14 Q. Did you have any dealings with Shahnaz</p> <p>15 Choudhri prior to the complaint being filed?</p> <p>16 A. Dealings? Other than her trying to tell us</p> <p>17 not to sue her son, I've never written a check to her.</p> <p>18 I've never had any other business with her, but she is</p> <p>19 part of his business.</p> <p>20 Q. So why did you sue her son, Ali Choudhri?</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 THE DEPONENT: Why? I'm sorry.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Yeah, why did you sue Ali Choudhri?</p> <p>25 A. Are you talking about this case?</p>
<p style="text-align: right;">Page 106</p> <p>1 isn't someone that's unfamiliar with the business.</p> <p>2 Q. What personal knowledge do you have prior to</p> <p>3 filing of the complaint that Ms. Shahnaz Choudhri was</p> <p>4 not a credible witness?</p> <p>5 A. Was not a credible witness.</p> <p>6 Q. Or not credible as a witness?</p> <p>7 A. She's got bias. It's her son, right, so.</p> <p>8 Q. What personal knowledge do you have of</p> <p>9 Miss Shahnaz Choudhri's -- well, scratch that.</p> <p>10 What personal knowledge do you have that</p> <p>11 Miss Shahnaz Choudhri knowingly committed a fraud</p> <p>12 against you?</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 THE DEPONENT: I'm a judgment creditor, and so</p> <p>15 assets that are in her name, they actually belong to Ali</p> <p>16 and she's helping him defraud me out of the judgment</p> <p>17 that I need to collect.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Which assets?</p> <p>20 A. You know, like I mentioned, she's -- there's</p> <p>21 been money going in and out of bank accounts. We have</p> <p>22 those bank accounts. They're in the same discovery that</p> <p>23 you have access to.</p> <p>24 Q. Were you aware of that before the complaint</p> <p>25 was filed?</p>	<p style="text-align: right;">Page 108</p> <p>1 Q. In this case.</p> <p>2 A. We bought a judgment. A judgment was assigned</p> <p>3 to us, and we're just trying to collect our money. I'm</p> <p>4 a judgment creditor.</p> <p>5 Q. If it turns out the judgment was superseded,</p> <p>6 what happens to that money if you win?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE DEPONENT: Calls for speculation.</p> <p>9 BY MR. POPE:</p> <p>10 Q. In your experience as a lawyer, isn't it true</p> <p>11 that a supersedeas bond would be awarded to the victor</p> <p>12 of the litigation?</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 THE DEPONENT: It's possible. I don't do</p> <p>15 business litigation so I'm not sure.</p> <p>16 BY MR. POPE:</p> <p>17 Q. You do personal injury litigation, correct?</p> <p>18 A. Yes, I do.</p> <p>19 Q. And that involves monetary judgments; is that</p> <p>20 correct?</p> <p>21 A. Correct.</p> <p>22 Q. So it would be possible that a loser or the</p> <p>23 person who lost could possibly put up a supersedeas</p> <p>24 bond; is that correct?</p> <p>25 A. That's --</p>

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<p style="text-align: right;">Page 109</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: Sure. That's possible.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Have you ever had a case where that's</p> <p>5 happened?</p> <p>6 A. No.</p> <p>7 Q. You've never had a case ever where there's</p> <p>8 been a supersedeas bond put up?</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 THE DEPONENT: I have not. No.</p> <p>11 MR. BALLASES: Were the other two judgments</p> <p>12 superseded? I'm not sure if something happened today.</p> <p>13 MS. MACGEORGE: This is not a question and</p> <p>14 answer session.</p> <p>15 MR. BALLASES: Sorry.</p> <p>16 BY MR. POPE:</p> <p>17 Q. How did you become aware of the three</p> <p>18 judgments?</p> <p>19 A. I became aware of the two judgments, the first</p> <p>20 initial two judgments because I have the relationship</p> <p>21 with Hoover Slovacek. And the third judgment I became</p> <p>22 aware of because I have a relationship with</p> <p>23 Mr. Abdullatif.</p> <p>24 Q. Do you have a relationship with Hoover</p> <p>25 Slovacek beyond attorney/client?</p>	<p style="text-align: right;">Page 111</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: I don't know how much it is.</p> <p>3 BY MR. POPE:</p> <p>4 Q. What percentage of ownership do you have in</p> <p>5 the judgment obtained in Jetall Companies, Inc. versus</p> <p>6 Hoover Slovacek?</p> <p>7 A. I believe about a third.</p> <p>8 Q. And what -- and what dollar amount -- how much</p> <p>9 is your interest worth?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: I'm not sure. The total payoff</p> <p>12 is 1.2 million so.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Does that include attorney's fees?</p> <p>15 A. I believe so.</p> <p>16 Q. Does that include costs?</p> <p>17 A. I think so.</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 BY MR. POPE:</p> <p>20 Q. Do you know the amount of the actual judgment</p> <p>21 itself prior to attorney's fees and costs?</p> <p>22 A. I don't offhand.</p> <p>23 Q. Does that include attorney's fees both before</p> <p>24 and after the filing of this complaint?</p> <p>25 A. I believe so --</p>
<p style="text-align: right;">Page 110</p> <p>1 A. No.</p> <p>2 Q. So as a client of Hoover Slovacek, they told</p> <p>3 you about another client's judgment?</p> <p>4 A. Well, I wouldn't talking about --</p> <p>5 MR. BALLASES: I'm going to object to. I'm</p> <p>6 not going to object. I'm going to assert the</p> <p>7 attorney/client privilege and instruct you not to answer</p> <p>8 anything about what we've communicated about.</p> <p>9 BY MR. POPE:</p> <p>10 Q. How much of the judgment obtained in the case</p> <p>11 of Osama Abdullatif and Abdullatif and Company versus</p> <p>12 Ali Choudhri and Houston Real Estate Property do you</p> <p>13 own?</p> <p>14 A. I don't believe --</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: I don't believe I own that</p> <p>17 judgment.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Okay. Do you believe you own the judgment</p> <p>20 obtained in Jetall Companies, Inc. and Declaration Title</p> <p>21 Company versus Allan Daughtry?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. How much of that judgment do you own?</p> <p>24 A. A third of it.</p> <p>25 Q. A third. And how much is that judgment?</p>	<p style="text-align: right;">Page 112</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: Actually, I'm not sure. I'll</p> <p>3 refer to my counsel for that.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Have you ever worked for jet -- have you ever</p> <p>6 worked for Jetall Companies?</p> <p>7 A. Have I ever worked for Jetall Companies? No.</p> <p>8 No, I haven't.</p> <p>9 Q. Did you ever seek employment with Jetall</p> <p>10 Companies?</p> <p>11 A. No.</p> <p>12 Q. Did you ever inquire about working for Jetall</p> <p>13 Companies or any of its principals?</p> <p>14 A. In the context of developing the property that</p> <p>15 they defrauded me out of, yes.</p> <p>16 Q. Developing which property?</p> <p>17 A. Avondale.</p> <p>18 Q. And you wanna work for them in what capacity?</p> <p>19 A. To help develop the property.</p> <p>20 Q. Help develop it how?</p> <p>21 A. You know, this is the subject of other</p> <p>22 litigation so I'm not going to be answering questions</p> <p>23 about this.</p> <p>24 Q. Well, you were seeking employment as counsel,</p> <p>25 litigation counsel? What was the job?</p>

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1 A. No, not litigation counsel. Developing a
2 property together.
3 **Q. Property development?**
4 A. Yes.
5 **Q. In your individual capacity or one of your**
6 **companies?**
7 A. No, individual.
8 **Q. And when was that?**
9 A. I think that was 2010 or '11, something like
10 that.
11 **Q. Before or after you met Mr. Abdullatif?**
12 A. Oh, it was definitely before.
13 **Q. Were you ever the lawyer for Ali Choudhri?**
14 A. No, absolutely not.
15 **Q. Were you ever a lawyer representing any of the**
16 **named defendants?**
17 A. No. Never.
18 **Q. Did you ever provide legal advice or legal**
19 **counsel to any of the named defendants?**
20 A. Never.
21 **Q. Do you have any personal knowledge that**
22 **Shahnaz Choudhri made fraudulent transfers of personal**
23 **property?**
24 MR. BALLASES: Objection. Form.
25 THE DEPONENT: Based upon the bank statements,

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1 that's what it appears to be.
2 BY MR. POPE:
3 **Q. Before obtaining the bank statements after the**
4 **complaint was filed. So before the complaint was filed**
5 **-- better question.**
6 **Do you have any personal knowledge of**
7 **fraudulent transfers of personal property --**
8 **MR. BALLASES: Objection.**
9 BY MR. POPE:
10 **Q. -- by Shahnaz Choudhri before the complaint**
11 **was filed?**
12 MR. BALLASES: Objection. Form.
13 THE DEPONENT: This has been asked and
14 answered, but I want to go back to the history. She's
15 involved in all aspects of the business. She's part of
16 AIG WT which defrauded Mr. Abdullatif. She's got
17 various entities under her name -- she's the member of
18 various entities which he controls.
19 **Q. Did you have personal knowledge of that before**
20 **the complaint was filed?**
21 A. Yes.
22 **Q. Yes or no.**
23 MR. BALLASES: Objection. Form.
24 BY MR. POPE:
25 **Q. If you've seen the transfers and the bank**

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1 **statements, what specific information you have about**
2 **those transfers?**
3 MR. BALLASES: Objection. Form.
4 THE DEPONENT: I don't have them in front of
5 me.
6 BY MR. POPE:
7 **Q. Who were they made to?**
8 MR. BALLASES: Objection. Form.
9 THE DEPONENT: I believe they were made to and
10 from Mrs. Choudhri to various entities.
11 BY MR. POPE:
12 **Q. Which entities?**
13 A. I don't know.
14 **Q. More than one?**
15 A. More than one.
16 **Q. More than ten?**
17 A. I'd say more than ten.
18 **Q. What specific knowledge that you have that any**
19 **of those transfers were actually fraudulent?**
20 MR. BALLASES: Objection. Form.
21 THE DEPONENT: Again, I'm going to base it on
22 my previous knowledge of the relationship between
23 Mr. Choudhri and Mrs. Choudhri. She's defrauded or he
24 has defrauded through her people that I know and various
25 entities has her name listed as a member. So that's my

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1 knowledge.
2 BY MR. POPE:
3 **Q. You only named one entity. What are the other**
4 **entities?**
5 A. I don't have them in front of me.
6 **Q. Have you filed a suit separate from this**
7 **lawsuit against Shahnaz Choudhri?**
8 A. No.
9 **Q. Have you filed any lis pendenses against any**
10 **of her properties?**
11 A. I -- to my -- I'm not sure. Maybe we have.
12 If there are other properties in her name, I will file
13 them. Yes.
14 **Q. Have you authorized the filings of any lis**
15 **pendenses against her properties?**
16 A. I don't know if we have personally. But if
17 there are, then we will.
18 **Q. But you have authorized the filings of certain**
19 **lis pendenses?**
20 A. Yes.
21 **Q. And those lis pendenses are against properties**
22 **owned by whom?**
23 A. Ali Choudhri and his related entities
24 including Shahnaz Choudhri.
25 **Q. And they were filed why? For what basis?**

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117 to 120

<p style="text-align: right;">Page 117</p> <p>1 What reason?</p> <p>2 A. So that I don't get defrauded as a judgment</p> <p>3 creditor.</p> <p>4 Q. So you were filing them to collect on your</p> <p>5 judgment?</p> <p>6 A. I'm filing them to prevent the fraudulent</p> <p>7 transfer of assets where I have money owed to me.</p> <p>8 Q. So you're filing them to prevent transfer of</p> <p>9 assets?</p> <p>10 A. Correct. If the judgment's paid, we'll</p> <p>11 release them. Simple.</p> <p>12 Q. Do you plan to continue to file lis pendens?</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 THE DEPONENT: If I'm not paid the money that</p> <p>15 I'm owed, yes.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Have you assisted anyone else in filing a lis</p> <p>18 pendens against any of the named defendants?</p> <p>19 A. I don't recall.</p> <p>20 Q. Have you assisted Hira Azhar in filing any lis</p> <p>21 pendenses against any of the named defendants?</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 THE DEPONENT: Not to my knowledge.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Have you assisted -- scratch that question.</p>	<p style="text-align: right;">Page 119</p> <p>1 BY MR. POPE:</p> <p>2 Q. Do you have any personal knowledge of outside</p> <p>3 of this case Shahnaz Choudhri owes John Quinlan any</p> <p>4 money?</p> <p>5 A. I don't have any personal knowledge of that.</p> <p>6 Q. Do you have any personal knowledge that</p> <p>7 outside of this case Shahnaz Choudhri owes Abdullatif</p> <p>8 any money?</p> <p>9 A. Possibly she owes him money.</p> <p>10 Q. Do you have any personal knowledge of that?</p> <p>11 A. I don't.</p> <p>12 Q. Do you have any personal knowledge that</p> <p>13 Shahnaz Choudhri encumbered any of her assets or</p> <p>14 liabilities to dissuade a creditor, to dissuade one of</p> <p>15 her own creditors?</p> <p>16 A. I don't have any discovery in front of me so</p> <p>17 I'm not able to answer that question.</p> <p>18 Q. So you don't have any personal knowledge of</p> <p>19 that, do you?</p> <p>20 A. Not that I -- not that I'm aware of sitting</p> <p>21 here right now.</p> <p>22 Q. Did you assist Hira Azhar in suing Shahnaz</p> <p>23 Choudhri prior to this?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: That's a subject of other</p>
<p style="text-align: right;">Page 118</p> <p>1 After your alter ego claim, you don't have any</p> <p>2 personal knowledge of Shahnaz Choudhri making any</p> <p>3 fraudulent transfers, do you?</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: I don't understand the</p> <p>6 question.</p> <p>7 BY MR. POPE:</p> <p>8 Q. If we remove your alter ego theory, you don't</p> <p>9 have any personal knowledge of Shahnaz Choudhri making</p> <p>10 any fraudulent transfers, do you?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: It would still be a fraudulent</p> <p>13 transfer. If the judgment -- if I'm the judgment</p> <p>14 creditor, if the debtor owes me money and he transfers</p> <p>15 assets to anyone and it's an arm's length transaction,</p> <p>16 then that's a fraudulent transfer, right?</p> <p>17 BY MR. POPE:</p> <p>18 Q. But Shahnaz Choudhri does not owe you any</p> <p>19 money, does she?</p> <p>20 A. No, she does not.</p> <p>21 Q. Shahnaz Choudhri doesn't owe Quinlan any money</p> <p>22 either, does she?</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 THE DEPONENT: In what -- I mean, outside of</p> <p>25 this case?</p>	<p style="text-align: right;">Page 120</p> <p>1 pending litigation. I can't get into that.</p> <p>2 BY MR. POPE:</p> <p>3 Q. That litigation in pending in which county?</p> <p>4 A. Appellate Court Harris County.</p> <p>5 Q. Appellate Court. Are you counsel in that</p> <p>6 case?</p> <p>7 A. No.</p> <p>8 Q. Are you a party in that case?</p> <p>9 A. No.</p> <p>10 Q. So you're just refusing to answer even though</p> <p>11 you're not counsel or party to the case?</p> <p>12 A. I am a consulting attorney to Ms. Azhar.</p> <p>13 Q. So Ms. Azhar?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Did you in your -- have you ever been a</p> <p>16 consulting attorney to Chris Wyatt?</p> <p>17 A. He's a client.</p> <p>18 Q. He is a client. He was a client prior to the</p> <p>19 filing of the complaint?</p> <p>20 A. Yes.</p> <p>21 Q. And when did he become your client?</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 THE DEPONENT: I don't recall exactly.</p> <p>24 Sometime after he left the employment of Mr. Choudhri.</p> <p>25 BY MR. POPE:</p>

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121 to 124

<p style="text-align: right;">Page 121</p> <p>1 Q. 2023?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: I think before that.</p> <p>4 BY MR. POPE:</p> <p>5 Q. 2022?</p> <p>6 A. I'm not sure to be honest with you.</p> <p>7 Q. Before or after 2020?</p> <p>8 A. I think after he was wrongfully terminated</p> <p>9 from Jetall from what I understand.</p> <p>10 Q. When do you believe he was wrongfully</p> <p>11 terminated from Jetall?</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 THE DEPONENT: I don't know. I'm not sure.</p> <p>14 BY MR. POPE:</p> <p>15 Q. So as you sit here today, you don't know when</p> <p>16 he became your client?</p> <p>17 A. As I sit here today --</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: As I sit here today, I don't</p> <p>20 know exactly when.</p> <p>21 BY MR. POPE:</p> <p>22 Q. Were you ever given a server or hard drive</p> <p>23 that belonged to Mr. Ali Choudhri?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: No. I'm not going to answer</p>	<p style="text-align: right;">Page 123</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: No.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Do you have any personal knowledge of any</p> <p>5 fraudulent acts Miss Shahnaz Choudhri committed against</p> <p>6 you?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE DEPONENT: Again, in the context of this</p> <p>9 case, if she is helping hide assets or entities</p> <p>10 connected to Ali Choudhri, which she is, then she's</p> <p>11 committing fraud against me.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Okay. But since you said if, are we to assume</p> <p>14 you do not have any personal knowledge of the fraudulent</p> <p>15 acts?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: To the best of my personal</p> <p>18 knowledge.</p> <p>19 BY MR. POPE:</p> <p>20 Q. So you have zero personal knowledge of that?</p> <p>21 A. No, I do have personal knowledge.</p> <p>22 Q. Of which alleged fraudulent act against you?</p> <p>23 A. Well, if we look at the -- I'm a judgment</p> <p>24 creditor in this case. If you look at the money that's</p> <p>25 been transferred back and forth between the entities and</p>
<p style="text-align: right;">Page 122</p> <p>1 that question.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Is the answer no or is it you're not going to</p> <p>4 answer that question?</p> <p>5 A. I'm not going to answer that question.</p> <p>6 Q. Are you refusing to answer?</p> <p>7 A. Yes.</p> <p>8 Q. On what basis?</p> <p>9 MR. BALLASES: You're asserting your</p> <p>10 attorney/client or attorney work product privilege for</p> <p>11 Chris Wyatt?</p> <p>12 THE DEPONENT: Yes, I am.</p> <p>13 BY MR. POPE:</p> <p>14 Q. So you're asserting the privilege that did you</p> <p>15 or did not receive a hard drive?</p> <p>16 A. Yes. We can take it up with the judge if we</p> <p>17 need to.</p> <p>18 Q. Did you include Miss Shahnaz Choudhri in this</p> <p>19 complaint just to put pressure on Ali Choudhri to pay</p> <p>20 the debt?</p> <p>21 A. Not at all.</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Was the complaint filed to harass Shahnaz</p> <p>25 Choudhri?</p>	<p style="text-align: right;">Page 124</p> <p>1 Mrs. Choudhri, those are assets that would belong to me</p> <p>2 as judgment creditor.</p> <p>3 Q. But the bank statements that would contain</p> <p>4 those alleged transfers you obtained after the complaint</p> <p>5 was filed, correct?</p> <p>6 A. Yes.</p> <p>7 Q. So before the complaint was filed, what</p> <p>8 personal knowledge did you have?</p> <p>9 A. Again, going back to what I --</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: My previous answer, which is a</p> <p>12 good faith basis that she helps Mr. Choudhri defraud</p> <p>13 creditors.</p> <p>14 BY MR. POPE:</p> <p>15 Q. And what did you base that good faith belief</p> <p>16 on before the complaint was filed if you had not yet</p> <p>17 received and reviewed the bank statements?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: There's an entity called AIG WT</p> <p>20 where they defrauded Mr. Abdullatif out of millions of</p> <p>21 dollars with her son. She is active -- actively</p> <p>22 involved in every aspect of the Jetall business. She</p> <p>23 has an office there. And there are entities where she</p> <p>24 is listed as a member that we can show you.</p> <p>25 BY MR. POPE:</p>

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125 to 126

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1 Q. Are you aware that Chris Wyatt stole a hard
2 drive from Jetall or Ali?
3 A. No, I'm not.
4 MR. BALLASES: Objection. Form.
5 THE REPORTER: I'm sorry. I couldn't hear
6 your answer.
7 THE DEPONENT: Sorry. I'm not aware of it,
8 no.
9 BY MR. POPE:
10 Q. Did you receive a hard drive from Chris Wyatt?
11 MR. BALLASES: Objection. Form.
12 THE DEPONENT: Asked and answered. I'm not
13 going to go there again.
14 BY MR. POPE:
15 Q. So did you receive a hard drive from Chris
16 Wyatt?
17 A. I'm not going to answer that question.
18 MR. BALLASES: Objection. Form. It's been
19 asked and answered, and he already asserted the
20 attorney/client work product legal privilege.
21 MR. KIRKLIN: Objection, form is plenty.
22 That's all you're allowed.
23 MR. BALLASES: Okay. Thanks.
24 MR. POPE: Is he refusing to answer the
25 question?

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1 THE DEPONENT: I've already asked the
2 question. I've already answered the question.
3 THE REPORTER: And, Counsel, just as a
4 reminder, if I can please get one at a time for a clear
5 record.
6 THE DEPONENT: These two aren't supposed to be
7 talking, but they seem to want to continue.
8 MR. KIRKLIN: You're not supposed to be
9 objecting to questions.
10 MR. BALLASES: Actually, he can. If Chris
11 Wyatt's his client, then he can assert the attorney/
12 client privilege and work product privilege and
13 object.
14 MR. KIRKLIN: He can't say asked and answered.
15 That's not for him to say.
16 MR. BALLASES: Okay. Got it.
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127 to 130

<p style="text-align: right;">Page 127</p> <p>1 BY MR. POPE:</p> <p>2 Q. So do you intend to keep filing lis pendenses</p> <p>3 against properties owned by the named defendants until</p> <p>4 you're paid?</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: To the extent that we can legally</p> <p>7 do something, yes, absolutely.</p> <p>8 BY MR. POPE:</p> <p>9 Q. When do you feel you can legally file a lis</p> <p>10 pendens?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: If the target of that lis pendens</p> <p>13 is making an effort to evade a judgment.</p> <p>14 BY MR. POPE:</p> <p>15 Q. And the target should be a defendant or a party</p> <p>16 to the judgement, or a third-party --</p> <p>17 A. The defendant or an alter ego of the defendant.</p> <p>18 Q. Has there been an alter ego finding in this case?</p> <p>19 MR. BALLASES: Objection. Form.</p> <p>20 THE DEPONENT: No. But we anticipate one will be</p> <p>21 found.</p> <p>22 BY MR. POPE:</p> <p>23 Q. So you believe you can file a lis pendens against</p> <p>24 a third party before an alter ego find?</p> <p>25 MR. BALLASES: Objection. Form.</p>	<p style="text-align: right;">Page 129</p> <p>1 ego cause of action?</p> <p>2 A. I'll let the --</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 THE DEPONENT: I'll let the Court decide that, if</p> <p>5 we can or not.</p> <p>6 BY MR. POPE:</p> <p>7 Q. What real property interest do you hold in</p> <p>8 regards to any of the -- let me see here -- the real</p> <p>9 property interest that you hold in regards to any real</p> <p>10 estate owned by any of the named defendants?</p> <p>11 A. If Mr. Choudhri owns an interest in it, then I</p> <p>12 have an interest in it.</p> <p>13 Q. Okay. And how are you determining whether or not</p> <p>14 he has an interest in the property?</p> <p>15 A. On his -- whether he owns it or not.</p> <p>16 Q. Okay. So if his name does not appear on a</p> <p>17 property, do you feel you should have a lis pendens on it?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: If his name does not appear on a</p> <p>20 property --</p> <p>21 BY MR. POPE:</p> <p>22 Q. If his name does not appear on the deed for the</p> <p>23 property, do you --</p> <p>24 A. I don't know that that's the only thing that</p> <p>25 means you have an interest in a property.</p>
<p style="text-align: right;">Page 128</p> <p>1 THE DEPONENT: We believe that we can do what we</p> <p>2 need to do to protect our interests in a property, subject</p> <p>3 property, from being transferred out of our reach.</p> <p>4 BY MR. POPE:</p> <p>5 Q. And what do you think you can do to protect a</p> <p>6 property?</p> <p>7 A. We can --</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: -- file a lis pendens.</p> <p>10 BY MR. POPE:</p> <p>11 Q. What else do you think you can do?</p> <p>12 A. We can sue.</p> <p>13 Q. What else do you think you can do?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 THE DEPONENT: I think that's it.</p> <p>16 BY MR. POPE:</p> <p>17 Q. So you believe simply believing someone has an</p> <p>18 alter ego gives you the right to file a lis pendens against</p> <p>19 their property?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: No. I think you have to have a</p> <p>22 good faith basis.</p> <p>23 BY MR. POPE:</p> <p>24 Q. You believe you can file a lis pendens against a</p> <p>25 third party before a court has ruled on an alleged alter</p>	<p style="text-align: right;">Page 130</p> <p>1 Q. Well, what is another way to have an interest in</p> <p>2 a property?</p> <p>3 A. If he --</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: -- has some kind of contract or</p> <p>6 deed on it, if he has some sort of other undisclosed</p> <p>7 interest in it.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Okay. So if he has no interest in the property,</p> <p>10 do you think you have a right to put a lis pendens on it?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: Only if an alter ego owns it.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Okay. Absent your alter ego theory, that hasn't</p> <p>15 been ruled on yet by a court, did you -- do you believe you</p> <p>16 can put a lis pendens on property in which Ali Choudhri has</p> <p>17 no interest?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: Absent an alter ego finding, if I</p> <p>20 believe he is a -- is he's fraudulently transferring that</p> <p>21 property, I -- I believe we can.</p> <p>22 BY MR. POPE:</p> <p>23 Q. And which properties do you believe have been</p> <p>24 fraudulently transferred?</p> <p>25 MR. BALLASES: Objection. Form.</p>

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<p style="text-align: right;">Page 131</p> <p>1 THE DEPONENT: Again, I don't have the petition 2 in front of me. But -- 3 BY MR. POPE: 4 Q. You can't think of one property that you feel has 5 been fraudulently transferred? 6 A. I can't think of one. 7 MR. BALLASES: Objection. Form. 8 BY MR. POPE: 9 Q. You can't think of one? 10 A. He's been able to sell a lot of them, 11 unfortunately. 12 Q. Thank you. You make the statement, on page 21 of 13 your complaint, that "The Choudhri defendants, which, of 14 all the named defendants, have utilized their corporate 15 fiction for an illegitimate purpose." You believe Shahnaz 16 Choudhri is a corporate fiction? 17 MR. BALLASES: Objection. Form. 18 THE DEPONENT: Yes. 19 BY MR. POPE: 20 Q. Okay. What facts can you convey that would lead 21 you to believe that Shahnaz Choudhri, the individual, is a 22 corporate fiction? 23 MR. BALLASES: Objection. Form. 24 THE DEPONENT: I mean, I don't know if she's 25 an -- I don't think she's an LLC. She's -- she's got her</p>	<p style="text-align: right;">Page 133</p> <p>1 MR. BALLASES: Objection. Form. 2 THE DEPONENT: Well, my theory is -- is that 3 whatever money her son owes is the money she owes. So, 4 yes. 5 BY MR. POPE: 6 Q. Absent your theory that whatever money her son 7 owes is what she owes, are you aware of her -- you know, 8 personal knowledge of her efforts or any efforts that she 9 may have made to defraud any of her own creditors? 10 MR. BALLASES: Objection. Form. 11 THE DEPONENT: I don't know about that. 12 BY MR. POPE: 13 Q. Have you brought any other judgements against Ali 14 Choudhri, other then the three mentioned here? 15 A. I don't think so. 16 MR. BALLASES: Objection. Form. 17 BY MR. POPE: 18 Q. Okay. Have you made any agreements with George 19 Lee? 20 MR. BALLASES: Objection. Form. 21 THE DEPONENT: No. 22 BY MR. POPE: 23 Q. Do you or any of your entities have an agreement 24 with George Lee or any of his entities? 25 MR. BALLASES: Objection. Form.</p>
<p style="text-align: right;">Page 132</p> <p>1 own -- she's an individual. But I believe that there are 2 entities that she's a managing member of or a controlling 3 member of that -- that are a corporate fiction, because 4 they're just a means for Mr. Choudhri to do whatever he 5 needs to do. 6 BY MR. POPE: 7 Q. So I'm going to repeat that question -- 8 A. Yes. 9 Q. -- just to make sure we're on the same page. So 10 you believe Shahnaz Choudhri is a corporate fiction? 11 MR. BALLASES: Objection. Form. 12 THE DEPONENT: Explain what you mean by 13 "corporate fiction." 14 BY MR. POPE: 15 Q. Just, your -- your turn. "The -- the Choudhri 16 defendants have utilized their corporate fiction for an 17 illegitimate purpose." I'm just asking, do you include 18 Shahnaz Choudhri individually -- 19 A. I do. 20 Q. -- as a corporate fiction? 21 A. I mean, individually, she's a human being. But 22 any assets she controls are a corporate fiction -- or 23 entities. 24 Q. Do you have any personal knowledge that Shahnaz 25 Choudhri has attempted to defraud any of her own creditors?</p>	<p style="text-align: right;">Page 134</p> <p>1 THE DEPONENT: I don't think we do, to my 2 knowledge. 3 BY MR. POPE: 4 Q. Do you or any of your entities have any 5 contingency agreements with George Lee or any of his 6 entities? 7 A. I do not. 8 MR. BALLASES: Objection. Form. 9 BY MR. POPE: 10 Q. Do you represent George Lee? 11 A. I do not. 12 MR. BALLASES: Objection. Form. 13 THE DEPONENT: He has his own attorneys. 14 BY MR. POPE: 15 Q. Have you ever bought claims from George Lee? 16 MR. BALLASES: Objection. Form. 17 THE DEPONENT: I've bought claims from George 18 Lee? No. 19 BY MR. POPE: 20 Q. Have you ever been assigned any judgments that 21 were obtained by George -- George Lee? 22 MR. BALLASES: Objection. Form. 23 THE DEPONENT: I don't think so. 24 BY MR. POPE: 25 Q. Do you represent Harold Polk?</p>

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<p style="text-align: right;">Page 135</p> <p>1 A. No, I do not.</p> <p>2 Q. Do you represent Mansoor Chaudhry?</p> <p>3 A. I do not represent Mansoor.</p> <p>4 Q. Do you represent David Tang?</p> <p>5 A. No.</p> <p>6 Q. Do you represent Rodney Drinnon?</p> <p>7 A. No.</p> <p>8 Q. Have you ever used WhatsApp to communicate?</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 THE DEPONENT: Sure.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Okay. Do you keep that app on your cell phone?</p> <p>13 A. Yes.</p> <p>14 Q. What's your cell phone number?</p> <p>15 A. 713-344-6036.</p> <p>16 Q. Where do you live?</p> <p>17 MR. BALLASES: Objection. Form.</p> <p>18 BY MR. POPE:</p> <p>19 Q. City, state?</p> <p>20 A. Houston, Texas.</p> <p>21 Q. What's your home address?</p> <p>22 MR. BALLASES: Objection. Form. Is there a</p> <p>23 reason you need that?</p> <p>24 THE DEPONENT: Yeah. Why do you need that?</p> <p>25 BY MR. POPE:</p>	<p style="text-align: right;">Page 137</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: I don't think so.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Do you think it would make you an alter ego of</p> <p>5 her?</p> <p>6 A. I don't think so.</p> <p>7 Q. Do you think that would make you her puppeteer?</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 BY MR. POPE:</p> <p>10 Q. Would it make you -- have you ever done business</p> <p>11 with your mom?</p> <p>12 A. No.</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Okay. Also, it was your earlier testimony that</p> <p>16 you had a partnership that your parents were once a part</p> <p>17 of?</p> <p>18 A. Yeah, I'm not sure if she was on it, to be</p> <p>19 honest. I don't think she was on it.</p> <p>20 Q. Okay. Just your dad?</p> <p>21 A. Yeah. I think, just my dad was.</p> <p>22 Q. Okay. Has your dad ever given you any money to</p> <p>23 help pay a debt?</p> <p>24 A. Sure.</p> <p>25 MR. BALLASES: Objection. Form.</p>
<p style="text-align: right;">Page 136</p> <p>1 Q. So you're not answering?</p> <p>2 A. Not answering.</p> <p>3 Q. You're at law firm. What's your law firm</p> <p>4 address?</p> <p>5 A. 5177 Richmond Avenue.</p> <p>6 Q. Which law firm is that?</p> <p>7 A. The Law Offices of Omar Khawaja.</p> <p>8 Q. Okay. And your other law firm is called what?</p> <p>9 Law group?</p> <p>10 A. That's all the same.</p> <p>11 Q. Oh. It's all the same? Same address? Same</p> <p>12 location?</p> <p>13 A. Yes.</p> <p>14 Q. Have you ever given your mom any money to pay a</p> <p>15 debt?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: I'm sure I have. Sure. Why not?</p> <p>18 BY MR. POPE:</p> <p>19 Q. Has your mom ever given you any money to help</p> <p>20 with any -- to pay a debt?</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 THE DEPONENT: So I'm sure she has.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Okay. Do you think that would make her an alter</p> <p>25 ego of you?</p>	<p style="text-align: right;">Page 138</p> <p>1 BY MR. POPE:</p> <p>2 Q. Has your dad ever given you money to help him</p> <p>3 invest in any property?</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: Probably, yes.</p> <p>6 BY MR. POPE:</p> <p>7 Q. Has your dad ever given you money or -- well, has</p> <p>8 your dad ever transferred money into an entity that you</p> <p>9 have an ownership interest in?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: I don't think so, no.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Have you ever transferred any money from an</p> <p>14 entity where you had an ownership interest to your dad?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: No.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Have you ever transferred any money from any</p> <p>19 entity in which you have an interest to your mom?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: Probably. Sure.</p> <p>22 BY MR. POPE:</p> <p>23 Q. To your siblings?</p> <p>24 A. Yes.</p> <p>25 MR. BALLASES: Objection. Form.</p>

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<p style="text-align: right;">Page 139</p> <p>1 BY MR. POPE:</p> <p>2 Q. Does Jetall have a judgment against you?</p> <p>3 A. No.</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 BY MR. POPE:</p> <p>6 Q. Does Jetall have a judgment against either of</p> <p>7 your entities?</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: I think, Khawaja Partners, yes.</p> <p>10 BY MR. POPE:</p> <p>11 Q. And what is Khawaja Partners?</p> <p>12 A. It's a partnership.</p> <p>13 Q. What does it do?</p> <p>14 A. Real estate.</p> <p>15 Q. Okay. Can you tell me more about that judgment?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: I think it's a judgment based upon</p> <p>18 a finding of liability, attorneys fees, something like</p> <p>19 that. Federal court.</p> <p>20 BY MR. POPE:</p> <p>21 Q. And have you paid that judgment?</p> <p>22 A. No.</p> <p>23 Q. Has any one of your entities made a payment</p> <p>24 toward that judgment?</p> <p>25 MR. BALLASES: Objection. Form.</p>	<p style="text-align: right;">Page 141</p> <p>1 was obtained against Khawaja Partners.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Khawaja Partners. When was it -- when was it</p> <p>4 obtained against Khawaja Partners?</p> <p>5 A. I believe it was 2017.</p> <p>6 Q. Are you offsetting the debt owed from that</p> <p>7 judgment against any of your collection attempts against</p> <p>8 Mr. Choudhri or his entities?</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 THE DEPONENT: Not at all.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Why not?</p> <p>13 A. Why should I?</p> <p>14 Q. What was the amount of that judgment?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: I'm not sure. I think it was</p> <p>17 200,000.</p> <p>18 BY MR. POPE:</p> <p>19 Q. This time, the judgment is final. Correct?</p> <p>20 A. I believe it's final.</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Why are you not paying the debt?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 BY MR. POPE:</p>
<p style="text-align: right;">Page 140</p> <p>1 THE DEPONENT: No. Why would they do that?</p> <p>2 BY MR. POPE:</p> <p>3 Q. I thought it was against one of your entities.</p> <p>4 A. So why would -- why would one entity pay another</p> <p>5 entity a judgment? That's what your client does.</p> <p>6 Q. No. I was asking if maybe any of your -- I mean,</p> <p>7 Khawaja Partners, have they paid anything on the judgment?</p> <p>8 A. No.</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 THE DEPONENT: It's an active lawsuit.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Okay. So the judgment has been appealed?</p> <p>13 A. No. The judgment hasn't been appealed.</p> <p>14 Q. So why do you believe it's active?</p> <p>15 A. Because there's another pending case with the</p> <p>16 same facts, same defendants and plaintiffs.</p> <p>17 Q. But that particular case that has a judgment has</p> <p>18 not been appealed?</p> <p>19 A. No. No.</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 BY MR. POPE:</p> <p>22 Q. When was that judgment obtained against you or</p> <p>23 your company?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: It wasn't obtained against me. It</p>	<p style="text-align: right;">Page 142</p> <p>1 Q. Or why is Khawaja Partners not paying the --</p> <p>2 A. Yeah. Not me. Khawaja Partners. Because</p> <p>3 Khawaja Partners has active claims against Jetall that are</p> <p>4 being litigated. And we -- we believe we're going to be</p> <p>5 successful in those claims.</p> <p>6 Q. Where are those claims filed?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE DEPONENT: Harris County District Court.</p> <p>9 BY MR. POPE:</p> <p>10 Q. Which tort has Ms. Shahnaz Choudhri committed</p> <p>11 against you?</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 THE DEPONENT: I'm not -- I'm not sure.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Well, your complaint says that she committed one</p> <p>16 or more torts against you. So I'm trying to figure out,</p> <p>17 which one did she commit?</p> <p>18 A. I'll -- I'll refer to my attorney for that.</p> <p>19 Q. Because you don't know of any torts, or because</p> <p>20 of the word "tort," or --</p> <p>21 A. I don't know of any particular torts, but they</p> <p>22 exist there in the petition that my attorneys filed.</p> <p>23 MR. BALLASES: It's fraudulent transfer, in case</p> <p>24 you're wondering.</p> <p>25 THE REPORTER: I'm sorry. What was that?</p>

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1 MR. BALLASES: I'm just helping him out. It's
2 fraudulent transfer, in case he's wondering.
3 MS. MACGEORGE: -- we didn't get an answer for
4 our deponent?
5 MR. BALLASES: I was just telling him because I
6 thought he needed --
7 MS. MACGEORGE: I'm just --
8 MR. BALLASES: -- help.
9 MS. MACGEORGE: I'm just wondering.
10 THE DEPONENT: Please don't answer.
11 MR. BALLASES: I won't.
12 BY MR. POPE:
13 Q. What damage did you incur as -- as a result of
14 the alleged tort Ms. Choudhri committed against you?
15 A. Well, my judgment hasn't been paid, so.
16 Q. Are your mom and dad owners of Khawaja Partners?
17 MR. BALLASES: Objection. Form.
18 THE DEPONENT: I'm not sure. I don't think so.
19 BY MR. POPE:
20 Q. Were they ever?
21 MR. BALLASES: Objection. Form.
22 THE DEPONENT: Maybe at some point they were.
23 BY MR. POPE:
24 Q. Has your mother ever entered into an agreement
25 with Jetall Companies?

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1 MR. BALLASES: Objection. Form.
2 THE DEPONENT: The agreement subject of the
3 litigation that's pending right now, yes.
4 BY MR. POPE:
5 Q. Okay. So an agreement was made for the -- the
6 new litigation, or the old litigation?
7 A. Old litigation.
8 Q. Old litigation. What -- what was that agreement?
9 MR. BALLASES: Objection. Form.
10 THE DEPONENT: It's over a -- it's a -- it's a --
11 now it's a dispute over real estate in Montrose.
12 BY MR. POPE:
13 Q. Which property?
14 A. Avondale.
15 MR. BALLASES: Objection. Form.
16 BY MR. POPE:
17 Q. Avondale.
18 MR. KIRKLIN: Jim, do you want to take a 10-
19 minute break at the top of the hour?
20 MR. BALLASES: I'd prefer to keep going.
21 MR. KIRKLIN: What do -- what do you want to do,
22 Jim?
23 MR. POPE: Yeah. We'll take a 10-minute break.
24 That'd be great.
25 MR. BALLASES: Okay.

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1 THE VIDEOGRAPHER: All parties agree we're going
2 off the record?
3 We're going off the record at 3:02 p.m.
4 (WHEREUPON, a recess was taken.)
5 THE VIDEOGRAPHER: We're going back on the record
6 at 3:22 p.m.
7 BY MR. POPE:
8 Q. All righty. All right. Mr. Khawaja, did you
9 file or cause to be filed a notice of lis pendens on the
10 property at 8050 to 8098 Westheimer?
11 A. As a part of this case?
12 Q. It's part of -- yes, as part of this case.
13 A. Then, yes.
14 Q. Okay. And do you believe that -- do you believe
15 you have an interest in that real property?
16 A. Yes.
17 Q. Okay. And based upon what?
18 A. As a judgment creditor of Choudhri.
19 Q. Okay. How about the property at -- is there any
20 other reason?
21 A. No other reason that I can think of at this
22 moment.
23 Q. Okay. Are you trying to enforce an encumbrance
24 against that real property?
25 A. It's not an encumbrance.

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1 Q. Okay. Is it a dispute involving title to real
2 property, to that real property? Is there a title dispute?
3 A. I think it's arguable, yes.
4 Q. But is there currently a title dispute?
5 A. I would argue that the title would belong to us,
6 to satisfy our judgment.
7 Q. Is that -- based upon what theory?
8 A. Based upon the fact that I'm a judgment creditor
9 against Mr. Choudhri.
10 Q. Okay. Your judgment is against Mr. Choudhri
11 individually?
12 A. Jetall Companies.
13 Q. Jetall Companies. And is this property owned by
14 Jetall Companies?
15 A. It's owned by an alter ego of Jetall Companies.
16 Q. Is it owned by Jetall Companies?
17 A. An alter ego --
18 MR. BALLASES: Objection. Form.
19 BY MR. POPE:
20 Q. Is the property owned by Jetall -- so the
21 property is not owned by Jetall Companies. Correct?
22 A. Correct.
23 Q. Okay. Is that property owned by any of the other
24 named entity defendants?
25 A. I'm sorry?

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<p style="text-align: right;">Page 147</p> <p>1 Q. I'll scratch that. Is the -- did you have a</p> <p>2 notice of lis pendens filed against a property, or cause to</p> <p>3 be filed against a property at 4521 San Felipe Street,</p> <p>4 Unit 3201, here in Houston?</p> <p>5 A. I believe so, yes.</p> <p>6 Q. Okay. And do you believe you have a title</p> <p>7 dispute as -- in relation to that property?</p> <p>8 A. Yes, arguably.</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 BY MR. POPE:</p> <p>11 Q. Arguably. Based upon what theory?</p> <p>12 A. That I'm a judgment creditor of Jetall Companies,</p> <p>13 and this entity is controlled by him or his entities, and</p> <p>14 it's an alter ego.</p> <p>15 Q. Is this property owned by Jetall Companies?</p> <p>16 A. No.</p> <p>17 MR. BALLASES: Objection. Form.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Do you have a lis pendens against -- or caused a</p> <p>20 lis pendens to be filed against a property at 2727 Kirby,</p> <p>21 Condominium Unit 26L?</p> <p>22 A. Yes. Do we? I think we -- I'm not sure if we do</p> <p>23 anymore. Yes.</p> <p>24 Q. Okay. And do you believe you have a title</p> <p>25 dispute in reference to that property?</p>	<p style="text-align: right;">Page 149</p> <p>1 A. I do.</p> <p>2 Q. Are you attempting to enforce an encumbrance</p> <p>3 against this real property?</p> <p>4 A. I don't think it's an encumbrance.</p> <p>5 Q. Okay. And what is your basis for the alleged</p> <p>6 title dispute or interest in real property?</p> <p>7 A. That I'm a judgment creditor of Jetall Companies,</p> <p>8 and those are alter egos of Jetall Companies.</p> <p>9 Q. But are these properties owned by Jetall --</p> <p>10 A. No.</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Were any lis pendenses filed against any of the</p> <p>14 named defendants, other than Jetall Companies, filed to</p> <p>15 enforce an encumbrance against that real property?</p> <p>16 A. I don't know if there were, that I -- that I can</p> <p>17 think of, other than the ones that you just named.</p> <p>18 Q. Okay. Have you filed or caused to be -- we'll</p> <p>19 take a different question -- any lis pendens, other than</p> <p>20 the ones I've just mentioned, that may be out there, filed</p> <p>21 against entities that you believe are the alter ego of</p> <p>22 Jetall -- of Jetall are the only basis for your alleged</p> <p>23 title dispute or interest in the property?</p> <p>24 A. Is that a question?</p> <p>25 Q. That's a question.</p>
<p style="text-align: right;">Page 148</p> <p>1 A. Yes, arguably.</p> <p>2 Q. Do you believe you have an interest in -- in that</p> <p>3 real property?</p> <p>4 A. Yes.</p> <p>5 Q. Based upon what?</p> <p>6 A. Being a judgment creditor of Jetall Companies.</p> <p>7 Q. But is this property owned by Jetall Companies?</p> <p>8 A. No.</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 BY MR. POPE:</p> <p>11 Q. No. The other property at 4521 San Felipe</p> <p>12 Street, Unit 3201, do you know who lives there?</p> <p>13 A. I don't know who lives there.</p> <p>14 Q. Do you have a notice of lis pendens filed or</p> <p>15 caused a notice of lis pendens to be filed against</p> <p>16 properties at 3550 Charleston Street, 6531 Rodrigo Street,</p> <p>17 8503 Blossom Street, 207 Malcolm Street, or 4401 Schurmier</p> <p>18 Street, all in Houston, Texas?</p> <p>19 A. I believe those are lis pendens that we</p> <p>20 authorized, yes.</p> <p>21 Q. And you believe they're the -- that you have a</p> <p>22 title dispute in reference to these properties?</p> <p>23 A. Yes, arguably.</p> <p>24 Q. You believe that you are -- have an interest in</p> <p>25 real property for these properties?</p>	<p style="text-align: right;">Page 150</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: Yeah.</p> <p>3 MR. POPE: Let me ask it in a better way.</p> <p>4 THE DEPONENT: Please.</p> <p>5 BY MR. POPE:</p> <p>6 Q. Is your only claim to having an interest in any</p> <p>7 real property for which you have filed a lis pendens</p> <p>8 against any of the named defendants simply based upon your</p> <p>9 alter ego theory of liability?</p> <p>10 A. I mean, I -- I would defer to my attorneys for</p> <p>11 that answer, if there's a legal, you know, conclusion that</p> <p>12 needs to be drawn. But to my knowledge, that is at least</p> <p>13 one of the bases for it.</p> <p>14 MR. BALLASES: Object to the form of that.</p> <p>15 BY MR. POPE:</p> <p>16 Q. Would you be surprised to know that the property</p> <p>17 at 4521 San Felipe Street, Unit 3201, is Mr. Choudhri's</p> <p>18 homestead?</p> <p>19 MR. BALLASES: Objection. Form.</p> <p>20 THE DEPONENT: I would be surprised.</p> <p>21 BY MR. POPE:</p> <p>22 Q. Do you believe you'd have a right to put a lis</p> <p>23 pendens on his homestead?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: If he made it a homestead after a</p>

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1 judgement was filed, then I would say that he may be --

2 that may be some sort of violation.

3 BY MR. POPE:

4 Q. Do you believe you'd have the right to put a lis

5 pendens on his -- Mr. Choudhri's homestead?

6 MR. BALLASES: Objection. Form.

7 THE DEPONENT: I'd defer to my attorneys for

8 that.

9 BY MR. POPE:

10 Q. So you're choosing not to answer the question?

11 A. I -- I'm --

12 MR. BALLASES: Objection. Form.

13 THE DEPONENT: I'm not a real estate lawyer.

14 BY MR. POPE:

15 Q. Have you filed or caused to be filed any lis

16 pendenses against any other entity, any other named

17 defendant other than Jetall Companies?

18 MR. BALLASES: Objection. Form.

19 THE DEPONENT: Not that I'm aware of.

20 BY MR. POPE:

21 Q. Have you filed any lis pendenses against property

22 owned by Arabella PH 3201?

23 A. I'm not sure.

24 Q. Have you filed any lis pendenses against property

25 owned by Cypress BridgeCo?

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1 A. I don't think so.

2 Q. Have you filed or caused to be filed any -- any

3 lis pendenses against property owned by Magnolia BridgeCo,

4 LLC?

5 A. Pretty sure we have not.

6 Q. How about A. Kelly Williams?

7 A. I don't even know what that is.

8 Q. He's one of the named defendants --

9 A. I don't --

10 Q. -- or was one of the named defendants.

11 A. Okay. I don't think so.

12 Q. Okay. Considering those were also named

13 defendants in this alter ego cause of action complaint, is

14 there a reason why you did not file any lis pendenses

15 against properties owned by any of those entities or

16 Mr. Williams?

17 MR. BALLASES: Objection. Form.

18 THE DEPONENT: I don't know. I don't know the

19 answer to that. It's a legal decision, based upon advice

20 of counsel.

21 BY MR. POPE:

22 Q. Are you making the decision to file the lis

23 pendenses, or is someone else?

24 A. It's advice of counsel.

25 Q. Is it your intent to prevent the properties from

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1 being sold? Is that why you filed the lis pendens?

2 A. The intent is to prevent being defrauded out of

3 money owed by the debtor.

4 Q. Why did you sue BridgeCo? Well, let me say

5 the -- the names correctly. Why did you sue Cypress

6 BridgeCo, LLC, or Magnolia BridgeCo, LLC, which we'll refer

7 to as "the BridgeCo entities"?

8 A. Because they lent money on properties that

9 Mr. Choudhri or his entities owned free and clear, thereby

10 helping him potentially defraud creditors that he owes

11 money.

12 Q. Why did you sue A. Kelly Williams?

13 A. Same reason.

14 Q. Do you realize the properties can't be sold with

15 your lis pendens on them?

16 A. I don't --

17 MR. BALLASES: Objection. Form.

18 THE DEPONENT: -- agree with that.

19 BY MR. POPE:

20 Q. You believe properties can be sold with the lis

21 pendens?

22 A. I do.

23 Q. Have you made an agreement with the BridgeCo

24 entities in this case?

25 A. No.

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1 MR. BALLASES: Objection. Form.

2 BY MR. POPE:

3 Q. Do you have any personal knowledge that MCITBE,

4 LLC, Jetall/Croix Properties LP, and its general partner

5 Jetall/Croix GP have hid assets or placed assets beyond the

6 reach of creditors? Any personal knowledge?

7 A. I think one of those entities owns real estate or

8 owns a home or is developing houses. And our position

9 would be that if they're developing a home under the

10 control of Jetall Companies or Mr. Choudhri himself, then

11 we would have an interest in whatever property is being

12 developed or sold.

13 Q. And is that home that you believe is being built

14 the only asset you're aware of that they own?

15 A. I -- I think so. I can't -- sitting here today,

16 I don't have anything in front of me. But there may be

17 other assets. If there are, then we'd look for them.

18 Q. Do you have any personal knowledge that -- of any

19 efforts by them to hide an asset or place the asset beyond

20 the reach of their creditors?

21 A. Well, I'm a creditor.

22 Q. Do you have a judgment against MCITBE, absent

23 your alter ego theory?

24 A. Other than the alter ego theory, no.

25 Q. Okay. Do you have a judgment against Jetall/

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<p style="text-align: right;">Page 155</p> <p>1 Croix GP or the other -- Jetall/Croix Properties LP, absent 2 your alter ego theory? 3 A. No. Or fraudulent transfer. 4 Q. Okay. Do you have any personal knowledge that 5 any of those three entities have committed these bad acts 6 against you? 7 MR. BALLASES: Objection. Form. 8 THE DEPONENT: I -- I don't -- sitting here right 9 now, I don't have that. But if they've -- hide assets from 10 Mr. Choudhri or his entities, then that's a -- that's a bad 11 act. 12 BY MR. POPE: 13 Q. Do you have any evidence today that any of those 14 entities are a corporate fiction? 15 MR. BALLASES: Objection. Form. 16 THE DEPONENT: I mean, if Mr. Choudhri has 17 anything to do with it, then, yes, they are. 18 BY MR. POPE: 19 Q. Do you have any personal knowledge that -- the 20 fact -- or -- or the fact that you allege that they're a 21 corporate fiction? 22 MR. BALLASES: Objection. Form. 23 THE DEPONENT: Again, I would have to look at the 24 discovery to prove that. 25 BY MR. POPE:</p>	<p style="text-align: right;">Page 157</p> <p>1 THE DEPONENT: Many. 2 BY MR. POPE: 3 Q. Can you name one? 4 MR. BALLASES: Objection. Form. 5 THE DEPONENT: I -- I can't name one off the top 6 of my head, but I'm sure that's easy to find out. 7 BY MR. POPE: 8 Q. Do you have an ownership interest in any title 9 company? 10 A. I don't. 11 MR. BALLASES: Objection. Form. 12 BY MR. POPE: 13 Q. Okay. Have you ever closed a property with a lis 14 pendens on it? 15 MR. BALLASES: Objection. Form. 16 THE DEPONENT: I have not, but I know people who 17 have. 18 BY MR. POPE: 19 Q. Who? 20 MR. BALLASES: Objection. Form. 21 THE DEPONENT: Mr. Abdullatif. I think 22 Mr. Choudhri has, too. 23 BY MR. POPE: 24 Q. Other than those two, who else? 25 A. I don't know --</p>
<p style="text-align: right;">Page 156</p> <p>1 Q. Do you have any personal knowledge that they were 2 formed for an illegitimate purpose? 3 MR. BALLASES: Objection. Form. 4 THE DEPONENT: If they were formed by 5 Mr. Choudhri, then they -- the purpose would likely be 6 illegitimate. 7 BY MR. POPE: 8 Q. So you don't have any personal knowledge they 9 were formed for illegitimate purposes? 10 A. No. 11 MR. BALLASES: Objection. Form. 12 BY MR. POPE: 13 Q. So it's your contention today that any entity -- 14 so you believe -- it's your claim that any entity Ali has 15 or is a part of is an alter ego? 16 MR. BALLASES: Objection. Form. 17 THE DEPONENT: That's how he treats them, yes. 18 BY MR. POPE: 19 Q. Is that your claim? 20 A. That's our claim. 21 MR. BALLASES: Objection. Form. 22 BY MR. POPE: 23 Q. What title company will ensure the sale of a 24 property that has a lis pendens on it? 25 MR. BALLASES: Objection. Form.</p>	<p style="text-align: right;">Page 158</p> <p>1 MR. BALLASES: Objection. Form. 2 THE DEPONENT: -- anybody else. 3 BY MR. POPE: 4 Q. Do you know which property that was? 5 A. I -- I don't know. 6 MR. BALLASES: Objection. Form. 7 THE DEPONENT: You'd have to ask them. 8 BY MR. POPE: 9 Q. Do you have any personal knowledge of Otisco RDX 10 hiding any assets? 11 A. I think there is some property near San Antonio 12 that Otisco or another Choudhri-affiliated entity is 13 hiding. 14 Q. And you have personal knowledge of this? 15 A. Yes. 16 Q. How did you gain that personal knowledge? 17 A. I have -- just real property records. 18 Q. And you reviewed that before the complaint was 19 filed? 20 A. Yes. 21 Q. At those direction? 22 A. I mean, I -- 23 MR. BALLASES: Objection. Form. 24 THE DEPONENT: On my own. 25 BY MR. POPE:</p>

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159 to 162

<p style="text-align: right;">Page 159</p> <p>1 Q. How did you find out the property was there?</p> <p>2 A. I believe the name popped up in some other</p> <p>3 litigation.</p> <p>4 Q. Litigation to which you are a party?</p> <p>5 A. Maybe not a party. Maybe someone called me and</p> <p>6 consulted with me. I don't know who it was. Yeah.</p> <p>7 There's dozens of lawsuits against your client, so I get</p> <p>8 calls from people all the time.</p> <p>9 Q. Why would they call you?</p> <p>10 A. They probably see that I've been involved in some</p> <p>11 litigation against them.</p> <p>12 Q. Other than the three that are listed in the</p> <p>13 complaint?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 THE DEPONENT: Yeah.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Can you name --</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 BY MR. POPE:</p> <p>20 Q. -- the other lawsuits that you have against</p> <p>21 Mr. Choudhri?</p> <p>22 A. No.</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 THE DEPONENT: I -- I don't -- I don't -- I'm not</p> <p>25 sure which ones the are.</p>	<p style="text-align: right;">Page 161</p> <p>1 Q. And you wouldn't have any ownership interest in</p> <p>2 any of the same entities, or real estate?</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 THE DEPONENT: No.</p> <p>5 BY MR. POPE:</p> <p>6 Q. Are you aware that Jetall obtained a restraining</p> <p>7 order against Chris Wyatt before?</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: That could be the case. I</p> <p>10 don't --</p> <p>11 BY MR. POPE:</p> <p>12 Q. Are you aware that they -- they obtained the</p> <p>13 restraining order against Chris Wyatt -- Chris Wyatt to</p> <p>14 prevent him from disclosing or divulging confidential</p> <p>15 information?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: Not aware of that.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Are you aware that Chris Wyatt was once accused</p> <p>20 by a former employee of stealing information?</p> <p>21 A. No.</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Are you aware that Chris Wyatt once worked for</p> <p>25 Optum Mortgage?</p>
<p style="text-align: right;">Page 160</p> <p>1 BY MR. POPE:</p> <p>2 Q. Are -- are they against Mr. Choudhri</p> <p>3 individually, or his entities that he owns, or --</p> <p>4 A. No. I think --</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: I think, entities.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Entities?</p> <p>9 A. Yeah.</p> <p>10 Q. Do you have any litigation against Mr. Choudhri</p> <p>11 individually?</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 THE DEPONENT: Not pending.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Do you know Ali Mikaram?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: Casually.</p> <p>18 BY MR. POPE:</p> <p>19 Q. How do you know him, when you say, "casually"?</p> <p>20 A. Yeah. He's another -- he's an attorney.</p> <p>21 Q. He's an attorney. Okay. Do you have any</p> <p>22 business dealings with him?</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 THE DEPONENT: No.</p> <p>25 BY MR. POPE:</p>	<p style="text-align: right;">Page 162</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Are you aware there's a judgment against Chris</p> <p>4 Wyatt of Optum Mortgage, accusing him or finding him guilty</p> <p>5 of stealing information?</p> <p>6 A. No.</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Would you be surprised to find out that Mr. Wyatt</p> <p>10 may have given you some of that information?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: No.</p> <p>13 BY MR. POPE:</p> <p>14 Q. You wouldn't be --</p> <p>15 A. Oh. I would be surprised, yes.</p> <p>16 Q. Are you aware that there was an agreed final</p> <p>17 judgment and permanent injunction, preventing Chris Wyatt</p> <p>18 from -- by Optum Loan Servicing, preventing Chris -- Chris</p> <p>19 Wyatt from divulging the information he stole from them?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: No, I was not aware of that.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Are you aware that there was a case filed under</p> <p>24 201679190, about Optum Loan Servicing, against Chris Wyatt?</p> <p>25 MR. BALLASES: Objection. Form.</p>

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<p style="text-align: right;">Page 163</p> <p>1 THE DEPONENT: No. I think your client hired</p> <p>2 him. Not me.</p> <p>3 BY MR. POPE:</p> <p>4 Q. But didn't you get some information from Chris</p> <p>5 Wyatt you used to form the basis of your complaint?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: Possibly.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Well, isn't it also possible that some of the</p> <p>10 information you received was stolen and/or subject to</p> <p>11 orders where he was not to divulge that information?</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 THE DEPONENT: I don't think so.</p> <p>14 BY MR. POPE:</p> <p>15 Q. You don't think so? Or do you know?</p> <p>16 A. I don't --</p> <p>17 MR. BALLASES: Objection. Form.</p> <p>18 THE REPORTER: I'm sorry. I didn't catch all of</p> <p>19 your --</p> <p>20 THE DEPONENT: Sorry. I don't think that would</p> <p>21 be the case.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Are you aware that Chris Wyatt is a convicted</p> <p>24 felon?</p> <p>25 MR. BALLASES: Objection. Form.</p>	<p style="text-align: right;">Page 165</p> <p>1 BY MR. POPE:</p> <p>2 Q. Do you know Ashish Mahendru?</p> <p>3 A. I do.</p> <p>4 Q. How do you know him?</p> <p>5 A. He's my attorney.</p> <p>6 Q. He's your attorney. Is he also Chris Wyatt's</p> <p>7 lawyer?</p> <p>8 A. I believe --</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 BY MR. POPE:</p> <p>11 Q. Do you want to finish the question?</p> <p>12 A. I believe he is.</p> <p>13 Q. Okay. Are you aware that Chris Wyatt was a</p> <p>14 paralegal for Mr. Choudhri?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: No.</p> <p>17 BY MR. POPE:</p> <p>18 Q. And you were aware that he worked there, though,</p> <p>19 per your prior testimony. What did you think he did?</p> <p>20 A. I think he was chief of operations, or chief --</p> <p>21 COO or CFO or something.</p> <p>22 Q. For which entity, to your knowledge?</p> <p>23 A. To my knowledge, Jetall Companies.</p> <p>24 Q. Any other entities, to your knowledge?</p> <p>25 MR. BALLASES: I'm going to object to the form.</p>
<p style="text-align: right;">Page 164</p> <p>1 THE DEPONENT: I have no knowledge of that.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Chris Wyatt do any work for you?</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: No.</p> <p>6 BY MR. POPE:</p> <p>7 Q. He'd never been a paralegal for you, or --</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: No.</p> <p>10 BY MR. POPE:</p> <p>11 Q. Never a legal assistant?</p> <p>12 A. No.</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Have you ever paid Chris Wyatt to testify?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: Absolutely not.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Have you ever paid his legal fees?</p> <p>20 A. No.</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Does he owe you any legal fees?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: No. He doesn't owe me anything.</p>	<p style="text-align: right;">Page 166</p> <p>1 THE DEPONENT: No.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Are you aware that Texas Reit is in an active</p> <p>4 bankruptcy, filed in the Western District?</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: I think I've heard about that,</p> <p>7 yes.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Okay. Have you filed a proof of claim in that</p> <p>10 case?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: I think we did, and withdrew it.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Okay. Why did you file a claim in that case?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: For the same reason we filed a</p> <p>17 claim in this case. Mr. Choudhri owes us money.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Why are you withdrawing the claim in that --</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: There wasn't enough money in the</p> <p>22 entity to pay all the people that Mr. Choudhri owes money</p> <p>23 to.</p> <p>24 BY MR. POPE:</p> <p>25 Q. So you no longer believe Texas Reit has an alter</p>

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<p style="text-align: right;">Page 167</p> <p>1 ego?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: That's not what I said at all.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Do you believe Texas Reit is still an alter ego?</p> <p>6 A. Yes.</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Then why are you withdrawing the claim?</p> <p>10 MR. BALLASES: Objection. Form. He just</p> <p>11 answered that.</p> <p>12 BY MR. POPE:</p> <p>13 Q. What was your answer?</p> <p>14 A. My answer was there wasn't enough money in the</p> <p>15 claim to pay all the creditors that were owed.</p> <p>16 Q. How much money is there?</p> <p>17 A. I'm not sure. It was not enough to support all</p> <p>18 the creditors.</p> <p>19 Q. What did you review to determine that it wasn't</p> <p>20 enough to support all the creditors?</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 THE DEPONENT: I think it was the judge's order.</p> <p>23 I'm not sure. It's other pending -- other litigation.</p> <p>24 BY MR. POPE:</p> <p>25 Q. In that case, there's litigation?</p>	<p style="text-align: right;">Page 169</p> <p>1 entities Mr. Choudhri creates to evade creditors. But I</p> <p>2 don't know every single one off the top of my head.</p> <p>3 Q. Which ones do you know?</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: It's -- it's in the petition.</p> <p>6 BY MR. POPE:</p> <p>7 Q. I'll strike that.</p> <p>8 A. Thank you.</p> <p>9 Q. Let's see here. How did you determine which</p> <p>10 entities to sue?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 I'm going to instruct you not to answer. That</p> <p>13 gets into work product and attorney/client privilege.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Is there a reason why you attached the petition</p> <p>16 to the lawsuit filed in this case of the claim filed in the</p> <p>17 Texas Reit case?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 I'm also going to instruct you not to answer. It</p> <p>20 gets into attorney work product and attorney/client</p> <p>21 privilege.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Do you have any surveillance on Ali Choudhri?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: No.</p>
<p style="text-align: right;">Page 168</p> <p>1 A. Yes.</p> <p>2 Q. What litigation?</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 THE DEPONENT: For the sale of Texas Reit -- or</p> <p>5 the entities that Texas Reit owns, the bankruptcy.</p> <p>6 BY MR. POPE:</p> <p>7 Q. What entities does Texas Reit own?</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: It owns property on Westheimer</p> <p>10 that's -- that, I believe, is either being sold or will be</p> <p>11 sold.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Okay. But it doesn't -- to your knowledge, it</p> <p>14 doesn't own any other entities?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. Did you also sue Mountain Business Center,</p> <p>17 LLC, in this case?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: I mean, not to my knowledge.</p> <p>20 Could be. But I just don't know. Do you have something I</p> <p>21 can look at?</p> <p>22 BY MR. POPE:</p> <p>23 Q. Do you know all the defendants that you sued in</p> <p>24 this case?</p> <p>25 A. I know there's quite a few because of all the</p>	<p style="text-align: right;">Page 170</p> <p>1 BY MR. POPE:</p> <p>2 Q. Are you investigating or have any private</p> <p>3 investigator watching Mr. Choudhri or his mother?</p> <p>4 A. No.</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 BY MR. POPE:</p> <p>7 Q. What was the answer?</p> <p>8 A. "No."</p> <p>9 Q. No. How about his entities, watching his</p> <p>10 entities?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: How do you watch an entity?</p> <p>13 BY MR. POPE:</p> <p>14 Q. Watching who you believe to be the principals of</p> <p>15 the entities.</p> <p>16 A. No.</p> <p>17 MR. BALLASES: Objection. Form.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Have you, in the past?</p> <p>20 A. No.</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Do you have any joint enterprises with Osama</p> <p>24 Abdullatif?</p> <p>25 MR. BALLASES: Objection. Form.</p>

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171 to 174

<p style="text-align: right;">Page 171</p> <p>1 THE DEPONENT: I don't know. Is that a legal</p> <p>2 term that you're using?</p> <p>3 BY MR. POPE:</p> <p>4 Q. I don't know; you're a lawyer.</p> <p>5 A. On the business --</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: You can ask me about torts. You</p> <p>8 can do that all day.</p> <p>9 BY MR. POPE:</p> <p>10 Q. Do you an Osama Abdullatif have any --</p> <p>11 A. We -- we have this judgment together.</p> <p>12 Q. Okay. Other than this judgment, do you have</p> <p>13 anything else together?</p> <p>14 A. I mean --</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: We may have some real estate</p> <p>17 interests.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Okay. Which real estate interests?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: I don't -- I don't know, off the</p> <p>22 top of my head. I don't know. I have a lot of</p> <p>23 investments, so.</p> <p>24 BY MR. POPE:</p> <p>25 Q. So as we sit here today, you still believe Texas</p>	<p style="text-align: right;">Page 173</p> <p>1 A. No. The legal --</p> <p>2 MR. BALLASES: Objection.</p> <p>3 THE DEPONENT: -- strategy of dismissing them or</p> <p>4 not dismissing them, that's my -- within my attorney's</p> <p>5 purview.</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Do you believe 9201 Memorial has any money?</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 THE DEPONENT: Well, if it's an alter ego of</p> <p>11 Choudhri, then it's possible that it has money that he's</p> <p>12 hiding.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Well, Texas Reit is an alter ego of Choudhri,</p> <p>15 according to you. If you believe that, then shouldn't you</p> <p>16 keep your claim in the Western District because it has</p> <p>17 money?</p> <p>18 A. No, because --</p> <p>19 MR. BALLASES: Objection. Form.</p> <p>20 THE DEPONENT: -- in that case, there's a judge</p> <p>21 scrutinizing everything. So if we have the same -- if we</p> <p>22 have a judge scrutinizing every transaction on all of his</p> <p>23 entities, then, you know, we can abide by that, for sure.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Do you believe Dalio Holdings I has any money</p>
<p style="text-align: right;">Page 172</p> <p>1 Reit is an alter ego of Jetall, but you're choosing not to</p> <p>2 pursue it?</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 THE DEPONENT: I would pursue it if there was</p> <p>5 more money available for creditors. Unfortunately,</p> <p>6 there's -- all the money is gone.</p> <p>7 BY MR. POPE:</p> <p>8 Q. So you're choosing not to pursue it?</p> <p>9 A. Only because there's no money --</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Are you willing to have it completely dismissed</p> <p>13 from this case, rather than settle?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 You don't need to answer that. We're -- that's</p> <p>16 talking -- that's discussing attorney work product.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Would you want to dismiss it from this case?</p> <p>19 MR. BALLASES: Objection. Form.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Well, would you want to, if it had no money?</p> <p>22 A. I -- I would -- I would defer to my counsel for</p> <p>23 that. It's a legal question. They --</p> <p>24 Q. Whether -- whether or not Texas Reit has money is</p> <p>25 a legal question?</p>	<p style="text-align: right;">Page 174</p> <p>1 worth pursuing?</p> <p>2 A. In the -- our theory is that it's an alter ego.</p> <p>3 So, yes, we believe --</p> <p>4 Q. Outside of your alter ego theory, do you believe</p> <p>5 Dalio I -- Holdings I has any money sufficient to satisfy</p> <p>6 your judgment?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE DEPONENT: Somebody hired all these lawyers</p> <p>9 here today. Somebody's got money.</p> <p>10 BY MR. POPE:</p> <p>11 Q. But do you believe Dalio Holdings I has money</p> <p>12 sufficient to satisfy your judgment?</p> <p>13 A. Yes.</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 BY MR. POPE:</p> <p>16 Q. Based on what?</p> <p>17 MR. BALLASES: Objection. Form.</p> <p>18 THE DEPONENT: Based on it being an alter ego of</p> <p>19 Mr. Choudhri.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Outside of your alter ego theory, based on, what,</p> <p>22 other than --</p> <p>23 A. Then I don't know.</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 BY MR. POPE:</p>

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<p style="text-align: right;">Page 175</p> <p>1 Q. Outside of your alter ego theory, do you think</p> <p>2 any of the named defendants have income sufficient to</p> <p>3 satisfy your judgment?</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: They did, or they do, or they</p> <p>6 could in the future. We have to see.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Did you believe they had income sufficient to</p> <p>9 satisfy your judgment when the complaint was filed?</p> <p>10 A. Yes.</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Outside of your alter ego theory?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 THE DEPONENT: I don't know how you -- we divorce</p> <p>16 the alter ego theory from our complaint. That's -- that's</p> <p>17 a core part of the complaint.</p> <p>18 BY MR. POPE:</p> <p>19 Q. How did you determine that the -- the -- did you</p> <p>20 make any efforts to determine the net value of Dalio</p> <p>21 Holdings I before you filed this complaint?</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 THE DEPONENT: No.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Did you make an effort to determine the net value</p>	<p style="text-align: right;">Page 177</p> <p>1 are -- that have assets in them -- right? -- such as 9201</p> <p>2 Memorial, that had a certain value. Each had values.</p> <p>3 Things like that.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Are all these properties in Harris County?</p> <p>6 A. Not all of them. There's some in Austin.</p> <p>7 Q. So you -- you told me what you could have</p> <p>8 reviewed. I'm asking, what did you review?</p> <p>9 A. I did review --</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: I did review the -- the values of</p> <p>12 the properties.</p> <p>13 BY MR. POPE:</p> <p>14 Q. For which properties?</p> <p>15 A. 9201 Memorial, I think the Arabella property, I</p> <p>16 think the Austin properties, you know, the loan, some of</p> <p>17 the other real estate assets -- or some of the other real</p> <p>18 estate owned by the entities. I looked at all that.</p> <p>19 Q. Are you familiar with SAL ATX, LLC?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: Yes, vaguely. But, yes.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Are you familiar with Maya J, LLC?</p> <p>24 A. Yes.</p> <p>25 MR. BALLASES: Objection. Form.</p>
<p style="text-align: right;">Page 176</p> <p>1 of any of these entities before you filed -- any of these</p> <p>2 defendant entities before you filed your complaint?</p> <p>3 MR. BALLASES: Objection. Form. And to the</p> <p>4 extent you're getting into work product or attorney/client</p> <p>5 privilege, I instruct him not to answer in that regard.</p> <p>6 THE DEPONENT: I'm going to defer to my counsel's</p> <p>7 advice.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Okay. To the extent that it's non-privileged</p> <p>10 information, how did you --</p> <p>11 MR. BALLASES: Well, that's --</p> <p>12 THE DEPONENT: I don't think it's not privileged.</p> <p>13 It's work product.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Did you do any personal investigations as to --</p> <p>16 before you hired your counsel -- as to what the valuations</p> <p>17 of any of the non-entity defendants were worth?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: Beyond what's in the public</p> <p>20 record, no.</p> <p>21 BY MR. POPE:</p> <p>22 Q. What public record would you have reviewed to</p> <p>23 determine the value?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: I mean, there are entities that</p>	<p style="text-align: right;">Page 178</p> <p>1 MR. POPE:</p> <p>2 Q. Do you believe that they're also an alter ego of</p> <p>3 Jetall Companies under Ali Choudhri?</p> <p>4 A. Yes.</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 BY MR. POPE:</p> <p>7 Q. Is there a reason why you have not included them</p> <p>8 as a defendant in this lawsuit?</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 To the extent that gets into attorney/client or</p> <p>11 attorney work product, don't answer it.</p> <p>12 THE DEPONENT: Yeah. It's attorney/client.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Are you attempting to make any collections</p> <p>15 against those entities for one of your three judgments?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: No.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Do you assert that SAL ATX and Maya J, LLC, are</p> <p>20 alter egos of each other?</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 THE DEPONENT: I'm not aware of that.</p> <p>23 BY MR. POPE:</p> <p>24 Q. I just want to refresh my memory on this. Is it</p> <p>25 your contention that you only have an interest in two of</p>

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<p style="text-align: right;">Page 179</p> <p>1 the three judgments --</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: I believe, two of the three</p> <p>4 judgments.</p> <p>5 BY MR. POPE:</p> <p>6 Q. Okay. So you don't have an interest in the Osama</p> <p>7 Abdullatif and Abdullatif and Company, LLC versus Ali</p> <p>8 Choudhri and -- and HREP?</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 THE DEPONENT: That's correct.</p> <p>11 BY MR. POPE:</p> <p>12 Q. That's correct. So is there a reason why you</p> <p>13 claim your -- in your complaint that you hold an interest</p> <p>14 in all three?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: I'd have to defer to my counsel</p> <p>17 for that. I'm not sure.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Your complaint also references there being four</p> <p>20 different judgment creditors. However, only three of you</p> <p>21 guys are plaintiffs. Who's the fourth judgment creditor?</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 THE DEPONENT: I'm not sure if that's the case.</p> <p>24 BY MR. POPE:</p> <p>25 Q. On page 6, "Plaintiffs hold three judgments, and</p>	<p style="text-align: right;">Page 181</p> <p>1 I won't ask stupid questions.</p> <p>2 MS. MACGEORGE: So you're not going to mind if I</p> <p>3 answer questions on behalf of my deponent in our next</p> <p>4 deposition?</p> <p>5 MR. BALLASES: If I ask you stuff that is</p> <p>6 answerable from a pleading, then you can help me.</p> <p>7 MS. MACGEORGE: I think we had a whole deposition</p> <p>8 that was answerable from the documents --</p> <p>9 MR. BALLASES: Okay.</p> <p>10 MS. MACGEORGE: -- just two days ago.</p> <p>11 MR. BALLASES: Okay.</p> <p>12 BY MR. POPE:</p> <p>13 Q. "Plaintiff -- plaintiffs hold three judgments,</p> <p>14 and stand in the shoes of four different judgment</p> <p>15 creditors." Who are the four different judgment creditors?</p> <p>16 Who's the fourth judgment creditor?</p> <p>17 A. I -- I don't know who the fourth judgment</p> <p>18 creditor is.</p> <p>19 Q. Are you aware that John Quinlan and Ali Choudhri</p> <p>20 have done business together?</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 THE DEPONENT: I'm aware that Ali Choudhri has</p> <p>23 harassed John Quinlan; not that they've done business</p> <p>24 together.</p> <p>25 BY MR. POPE:</p>
<p style="text-align: right;">Page 180</p> <p>1 stand in the shoes of four different judgment creditors."</p> <p>2 MR. BALLASES: There are two judgment creditors</p> <p>3 in the Heil judgment, Heil and Davy. They own both.</p> <p>4 MS. MACGEORGE: Are we answering --</p> <p>5 MR. BALLASES: I mean --</p> <p>6 MS. MACGEORGE: -- again?</p> <p>7 MR. BALLASES: We're just wasting time. You're</p> <p>8 asking silly questions.</p> <p>9 MS. MACGEORGE: They're decent questions. He</p> <p>10 gets to ask them.</p> <p>11 MR. BALLASES: Okay.</p> <p>12 MS. MACGEORGE: You don't get to answer on behalf</p> <p>13 of --</p> <p>14 MR. BALLASES: Okay.</p> <p>15 MS. MACGEORGE: -- the deponent, Mr. Ballases.</p> <p>16 MR. BALLASES: Okay. I'm just trying to help him</p> <p>17 out.</p> <p>18 MR. POPE: Well, you're not allowed to --</p> <p>19 MS. MACGEORGE: Well, am I allowed --</p> <p>20 MR. BALLASES: I don't need your advice, bro.</p> <p>21 MS. MACGEORGE: -- to help my clients out in the</p> <p>22 next deposition we have together?</p> <p>23 MR. BALLASES: I won't ask stupid questions.</p> <p>24 MS. MACGEORGE: Can I answer on behalf of him?</p> <p>25 MR. BALLASES: I won't answer stupid questions.</p>	<p style="text-align: right;">Page 182</p> <p>1 Q. Do you have personal knowledge of that?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: I read the complaint.</p> <p>4 BY MR. POPE:</p> <p>5 Q. And how was he harassed?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: Well, Mr. Choudhri has a MO of</p> <p>8 trying to extort people that he thinks he can do business</p> <p>9 with. And he, I believe, threatened to sue Mr. Quinlan to</p> <p>10 not sell him the building that he had no interest in, he</p> <p>11 had no business doing. And it was an attempt to shake</p> <p>12 down. And Mr. Quinlan rightly did not succumb to that</p> <p>13 threat.</p> <p>14 BY MR. POPE:</p> <p>15 Q. How did you find out about the complaint?</p> <p>16 A. I read about it.</p> <p>17 MR. BALLASES: Objection. Form.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Where did you read about it?</p> <p>20 A. District clerk's website.</p> <p>21 MR. BALLASES: Form.</p> <p>22 THE REPORTER: I'm sorry. What was your answer?</p> <p>23 THE DEPONENT: District clerk's website.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Do you regularly check to see if Mr. Choudhri is</p>

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<p style="text-align: right;">Page 183</p> <p>1 involved in litigation?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: Not regularly. I'll check every</p> <p>4 once in a while.</p> <p>5 BY MR. POPE:</p> <p>6 A. Do you -- you check every once in a while? Why</p> <p>7 do you do that?</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: To make sure that he's not evading</p> <p>10 creditors like me.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Have you referred any counsel to John Quinlan?</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 THE DEPONENT: You know, I think, even if I did,</p> <p>15 it would be attorney/client privileged, so I wouldn't talk</p> <p>16 about that.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Do you have any personal knowledge that any of</p> <p>19 the named corporate entity defendants or the named entity</p> <p>20 defendants caused any debt to be placed on any of the</p> <p>21 assets?</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Better question. Are you aware of any of the</p> <p>25 assets owned by any of the entity defendants to be</p>	<p style="text-align: right;">Page 185</p> <p>1 A. I think that if her son owes someone money or an</p> <p>2 entity controlled by her son owes someone money, and she</p> <p>3 gets paid out of that entity's bank account, then she is</p> <p>4 hindering and defrauding creditors to her son or her son's</p> <p>5 entity.</p> <p>6 Q. But you don't have actual personal knowledge that</p> <p>7 she's done that?</p> <p>8 A. I -- I think we have some --</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 THE DEPONENT: -- knowledge of that in our</p> <p>11 discovery.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Did you have an personal knowledge of that before</p> <p>14 the case was filed?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Or the complaint was filed?</p> <p>18 A. Just on a general basis.</p> <p>19 Q. What was the general basis?</p> <p>20 A. Complaints against her helping her son defraud</p> <p>21 people.</p> <p>22 Q. You're aware of complaints against Shahnaz</p> <p>23 Choudhri?</p> <p>24 A. Yes.</p> <p>25 Q. Did you file those complaints?</p>
<p style="text-align: right;">Page 184</p> <p>1 encumbered by any mortgage or lien?</p> <p>2 A. Yeah. I think some of the named defendants that</p> <p>3 have property associated with them -- for example, 9201</p> <p>4 Memorial -- they were free and clear, unencumbered. And</p> <p>5 then Mr. Choudhri went out and got loans against them and</p> <p>6 encumbered them with debt, and then lost the properties to</p> <p>7 foreclosure.</p> <p>8 Q. Do you have personal knowledge of that?</p> <p>9 A. Yes.</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Do you have any personal knowledge that Shahnaz</p> <p>13 Choudhri had caused an asset to be encumbered with debt?</p> <p>14 A. I would have to review the bank statements that</p> <p>15 we have.</p> <p>16 Q. Did you have any personal knowledge of that</p> <p>17 before you filed this complaint?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: Other than what I've answered</p> <p>20 previously about the general relationship between Ms.</p> <p>21 Choudhri and Mr. Choudhri, no.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Do you have any personal knowledge that</p> <p>24 Ms. Shahnaz Choudhri acted with intent to hinder, delay, or</p> <p>25 defraud any creditors?</p>	<p style="text-align: right;">Page 186</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: I did not file the complaints, no.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Which complaints?</p> <p>5 A. From people in the community, from</p> <p>6 Mr. Abdullatif, from -- from Parvine Ladamore.</p> <p>7 Q. Say that name again?</p> <p>8 A. Parvine Ladamore.</p> <p>9 Q. Anyone else?</p> <p>10 A. I think other people in the Pakastani-American</p> <p>11 community have said that she's taken money from them to</p> <p>12 give to her son.</p> <p>13 Q. Do you know their names?</p> <p>14 A. I don't. I can --</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: -- follow up on that. Follow up</p> <p>17 on that.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p style="text-align: right;">Page 187</p> <p>1 BY MR. POPE:</p> <p>2 Q. What makes you believe you're entitled to</p> <p>3 exemplary damages?</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: I mean as a bad actor and in order</p> <p>6 to prevent that bad actor from committing further bad acts.</p> <p>7 Sometimes courts award exemplary damages, right, so we have</p> <p>8 a bad actor that has a history of acting badly, then</p> <p>9 perhaps exemplary damages prevent that from happening in</p> <p>10 the future.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Do you have any personal knowledge of Shahnaz</p> <p>13 Choudhri having a history of acting badly?</p> <p>14 MR. BALLASES: Form.</p> <p>15 THE DEPONENT: Based upon my knowledge that I've</p> <p>16 already discussed with you; I would say those are bad acts.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Do you intend to add any more defendants to this</p> <p>19 lawsuit?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: Only if I need to.</p> <p>22 BY MR. POPE:</p> <p>23 Q. How will you determine if you need to?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: If there's subsequent fraudulent</p>	<p style="text-align: right;">Page 189</p> <p>1 foreclosure.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Do you also believe that for the property located</p> <p>4 at Shepherd-Huldy?</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: I think David Greenberg owns that.</p> <p>7 BY MR. POPE:</p> <p>8 Q. And why do you believe that?</p> <p>9 MR. BALLASES: Form.</p> <p>10 THE DEPONENT: I saw some litigation between him</p> <p>11 and Mr. Choudhri.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Before or after the Complaint was filed?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 THE DEPONENT: I don't --</p> <p>16 BY MR. POPE:</p> <p>17 Q. I mean did you see the litigation before or after</p> <p>18 the --</p> <p>19 A. Yeah. I don't recall when -- when it was filed</p> <p>20 versus our Complaint. Maybe it was after. Not sure.</p> <p>21 Q. Did the foreclosures occur on those properties</p> <p>22 before or after your lis pendens were filed?</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 THE DEPONENT: I believe they occur -- I mean I</p> <p>25 don't know when the default occurred, so I mean the default</p>
<p style="text-align: right;">Page 188</p> <p>1 transfers, evading of our judgment, whoever they might be.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Who do you believe is the current holder of 9201</p> <p>4 Memorial?</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 BY MR. POPE:</p> <p>7 Q. The property located at 9201 Memorial?</p> <p>8 A. I think Cypress Bridge co-owns it now.</p> <p>9 Q. Why do you believe that?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: Because I believe they foreclosed</p> <p>12 on the asset.</p> <p>13 BY MR. POPE:</p> <p>14 Q. What personal knowledge do you have that</p> <p>15 foreclosure took place?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: There was a foreclosure in Harris</p> <p>18 County, and the asset was sold.</p> <p>19 BY MR. POPE:</p> <p>20 Q. To your knowledge, who is the owner of the</p> <p>21 property located, current owner of the property located at</p> <p>22 2727 Kirby?</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 THE DEPONENT: Same answer. I think Cypress</p> <p>25 Bridge co-owns it, or they lost it -- they obtained it in</p>	<p style="text-align: right;">Page 190</p> <p>1 probably occurred the minute he got them, but the</p> <p>2 foreclosure probably occurred after but I'm not sure.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Have you had any conversations with the BridgeCo</p> <p>5 entities --</p> <p>6 MR. BALLASES: Objection.</p> <p>7 BY MR. POPE:</p> <p>8 Q. -- or their corporate representatives?</p> <p>9 A. I have not.</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Have you had any conversations with A. Kelly</p> <p>13 Williams?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 THE DEPONENT: No; but I'd like to.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Have you attempted to reach out to him?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: I don't think so.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Have you talked to David Greenberg?</p> <p>22 A. Not --</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 THE DEPONENT: -- personally, no.</p> <p>25 BY MR. POPE:</p>

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191 to 194

<p style="text-align: right;">Page 191</p> <p>1 Q. Not personally. Why do you say not personally?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Did you have someone talk to him for you?</p> <p>5 A. No. I read the Complaint in the District Court's</p> <p>6 website.</p> <p>7 Q. Have you had someone talk to him for you?</p> <p>8 A. I have not.</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 BY MR. POPE:</p> <p>11 Q. Have you had someone talk to George Lee on your</p> <p>12 behalf?</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 THE DEPONENT: No. I've spoken to George Lee.</p> <p>15 BY MR. POPE:</p> <p>16 Q. Okay. You talk to him about this litigation?</p> <p>17 A. Not about this litigation.</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: About my -- my other litigation.</p> <p>20 BY MR. POPE:</p> <p>21 Q. What other litigation is that?</p> <p>22 A. The Avondale litigation.</p> <p>23 Q. What's this property address for the Avondale</p> <p>24 litigation?</p> <p>25 A. 208-210 Avondale.</p>	<p style="text-align: right;">Page 193</p> <p>1 Complaint?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: I'd have to defer to my counsel</p> <p>4 for that.</p> <p>5 BY MR. POPE:</p> <p>6 Q. Did you make any efforts to collect prior to</p> <p>7 filing this Complaint?</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: I'm not aware.</p> <p>10 BY MR. POPE:</p> <p>11 Q. How soon after the judgments being assigned to</p> <p>12 you did you actually filed the Complaint?</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 THE DEPONENT: Very soon after.</p> <p>15 BY MR. POPE:</p> <p>16 Q. Very soon after. So you didn't make a good faith</p> <p>17 effort to try to collect the funds before filing the</p> <p>18 Complaint, did you?</p> <p>19 MR. BALLASES: Objection. Form.</p> <p>20 THE DEPONENT: I don't know that that's the case.</p> <p>21 BY MR. POPE:</p> <p>22 Q. But you didn't personally attempt to make any</p> <p>23 genuine effort to collect the debt before you filed suit,</p> <p>24 is that correct?</p> <p>25 MR. BALLASES: Objection. Form.</p>
<p style="text-align: right;">Page 192</p> <p>1 Q. It's two properties?</p> <p>2 A. I think it's one property.</p> <p>3 Q. Are you aware of any lis pendens filed by Hira</p> <p>4 Azhar against any of the properties owned by any of the</p> <p>5 defendant entities?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: I'm not.</p> <p>8 BY MR. POPE:</p> <p>9 Q. You're not aware?</p> <p>10 A. I'm not aware.</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Have you communicated with Wayne Dolcefino</p> <p>14 regarding this litigation?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: No.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Have you hired any counsel other than Hoover</p> <p>19 Slovacek to assist in post-judgment and collection of those</p> <p>20 debts?</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 THE DEPONENT: Not to my knowledge, no.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Did you seek any post-judgment discovery in</p> <p>25 either of the underlying judgments before filing this</p>	<p style="text-align: right;">Page 194</p> <p>1 THE DEPONENT: I've been trying to settle with</p> <p>2 them for 10 years on other litigation, so I don't think</p> <p>3 that's going to work.</p> <p>4 BY MR. POPE:</p> <p>5 Q. On this litigation? What other litigation were</p> <p>6 you trying to collect on for 10 years?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE DEPONENT: The Avondale litigation.</p> <p>9 BY MR. POPE:</p> <p>10 Q. Has that litigation been pending for 10 years?</p> <p>11 A. Almost, yeah.</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Have you obtained a judgment in that case?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: No. We haven't obtained a</p> <p>17 judgment yet, no. My point in referencing that was that</p> <p>18 settlement negotiations with Mr. Choudhri are not very</p> <p>19 productive.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Did you attempt any settlement negotiations with</p> <p>22 Shahnaz Choudhri before you filed this case?</p> <p>23 A. I don't --</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: -- know. I'm not aware of that.</p>

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195 to 198

<p style="text-align: right;">Page 195</p> <p>1 BY MR. POPE:</p> <p>2 Q. What are the details of that other litigation,</p> <p>3 the Avondale litigation you keep referencing?</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: I mean I can't get into that</p> <p>6 because it's the subject of a jury trial coming up.</p> <p>7 BY MR. POPE:</p> <p>8 Q. What are the basic facts?</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 THE DEPONENT: A proper -- I can't get into that.</p> <p>11 I'm sorry.</p> <p>12 MR. BALLASES: Are you refusing to answer?</p> <p>13 BY MR. POPE:</p> <p>14 Q. What's the --</p> <p>15 MR. POPE: I'll ask him again.</p> <p>16 BY MR. POPE:</p> <p>17 Q. What are the just the basic general basis of the</p> <p>18 lawsuit?</p> <p>19 A. You know I can't get into that --</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: -- because there's a jury trial</p> <p>22 coming up.</p> <p>23 BY MR. POPE:</p> <p>24 Q. When is the jury trial set?</p> <p>25 MR. BALLASES: Objection. Form.</p>	<p style="text-align: right;">Page 197</p> <p>1 THE DEPONENT: Basically yes.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Any allegation of usury?</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: I can't get into that.</p> <p>6 BY MR. POPE:</p> <p>7 Q. Is there a reason why you won't get into the</p> <p>8 basic facts of the case, not the legal theories, but just</p> <p>9 the basic facts?</p> <p>10 A. Yes.</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: We have a jury trial coming up.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Do you have any other litigation pending against</p> <p>15 any other named defendant other than Jetall?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: Not at this stage, no.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Do you plan to file any lawsuits against any</p> <p>20 other named defendants other than Jetall?</p> <p>21 A. If I --</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 THE DEPONENT: Only if I need to.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Are you aware of any of the other named</p>
<p style="text-align: right;">Page 196</p> <p>1 THE DEPONENT: Very soon I think. Before the end</p> <p>2 of the year.</p> <p>3 BY MR. POPE:</p> <p>4 Q. What attorney did you retain in that suit?</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: Ashish Mahendru.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Ashish Mahendru. Do you know if Chris Wyatt is a</p> <p>9 witness in that case?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: If he needs to be, he will be.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Is Wayne Dolcefino going to be a witness in that</p> <p>14 case?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: If anybody needs to be a witness</p> <p>17 in that case, they will be.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Did you sue Jetall and other entities or just</p> <p>20 Jetall in that case?</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 THE DEPONENT: I think just Jetall.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Is it a breach of contract case?</p> <p>25 MR. BALLASES: Objection. Form.</p>	<p style="text-align: right;">Page 198</p> <p>1 defendants being in a bankruptcy other than Texas REIT?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: To my knowledge, no, but could be</p> <p>4 wrong.</p> <p>5 BY MR. POPE:</p> <p>6 Q. Other than the alleged alter ego claim, do you</p> <p>7 state you have any other claims against any of the other</p> <p>8 named defendants?</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 THE DEPONENT: I mean whatever the petition</p> <p>11 contains, we have those complaints alleged. I think there</p> <p>12 may be other complaints.</p> <p>13 MR. BALLASE: Are we ready to move onto John,</p> <p>14 next witness?</p> <p>15 MR. POPE: Almost. I want to make sure I haven't</p> <p>16 missed anything in the Complaint, and the First, Second and</p> <p>17 Third supplement.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Have you spoken to Dr. Sajid Ali, or Sajid Ali?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: No. Not recently. He's a friend.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Is he also a business partner?</p> <p>24 A. No.</p> <p>25 MR. BALLASES: Objection. Form.</p>

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199 to 202

Page 199

1 BY MR. POPE:

2 Q. How is he a friend?

3 MR. BALLASES: Objection. Form.

4 THE DEPONENT: Just in the religious community.

5 BY MR. POPE:

6 Q. Does he have any ownership interest in any of the

7 judgments --

8 MR. BALLASES: Objection.

9 BY MR. POPE:

10 Q. -- that were listed in the Complaint?

11 A. Not in a -- no. I doubt it, no.

12 MR. BALLASES: Objection. Form.

13 BY MR. POPE:

14 Q. Do you know who else has an interest in the first

15 judgment -- did anyone have -- better question.

16 Has the first judgment been assigned to anyone

17 else other than -- do you know who else the first judgment

18 may have been assigned to?

19 A. No.

20 MR. BALLASES: Objection. Form.

21 BY MR. POPE:

22 Q. Have you ever obtained medical records of Ali

23 Choudhri?

24 MR. BALLASES: Objection. Form.

25 THE DEPONENT: Medical records? No.

Page 200

1 BY MR. POPE:

2 Q. Did you make any efforts to amend that proof of

3 claim filed in Texas REIT before you attempted to withdraw

4 it?

5 MR. BALLASES: Objection. Form.

6 THE DEPONENT: I don't know.

7 BY MR. POPE:

8 Q. Do you have any personal knowledge that would

9 lead you to believe that Shahnaz Choudhri's entities that

10 she has formed were formed for an improper purpose?

11 MR. BALLASES: Objection. Form.

12 THE DEPONENT: Again, I'm going to rely on the

13 previous answers I've given you that there's a pattern of

14 conduct involving Mr. Choudhri to defraud investors,

15 creditors, evade judgments, and I believe that's the same

16 for this case.

17 BY MR. POPE:

18 Q. Before obtaining the bank records, all the

19 discovery that you received after filing the Complaint, did

20 mere review of HCAD records, public records, lead you to

21 believe that alter ego claim was warranted?

22 MR. BALLASES: Objection. Form.

23 THE DEPONENT: I wouldn't say mere review of

24 HCAD. I would say that it was based upon years of

25 knowledge of how they interact with each other.

Page 201

1 BY MR. POPE:

2 Q. How many years?

3 MR. BALLASES: Objection. Form.

4 THE DEPONENT: Since 2010 at least.

5 BY MR. POPE:

6 Q. What happened in 2010 that made you start

7 watching --

8 A. I think I just went back --

9 MR. BALLASES: Objection. Form.

10 THE REPORTER: I'm sorry. I didn't catch the

11 whole question.

12 BY MR. POPE:

13 Q. What happened in 2010 that would make you start

14 watching Mr. Choudhri's --

15 A. Nothing happened in 2010. 2013 is when I first

16 got defrauded by him, but the court -- the court history

17 goes backwards, sir, so.

18 Q. When did you first meet Mr. Choudhri?

19 A. I think maybe met him in 2012 or 2011 for the

20 first time maybe.

21 Q. Do your -- and how do your parents know Mrs.

22 Choudhri?

23 MR. BALLASES: Objection. Form.

24 THE DEPONENT: My parents know them? Well,

25 because my dad and his dad were friends.

Page 202

1 BY MR. POPE:

2 Q. Got you. How did you get defrauded by Mr.

3 Choudhri in 2013?

4 MR. BALLASES: Objection. Form.

5 THE DEPONENT: Again, it's the subject of other

6 pending litigation. I can't get into it.

7 BY MR. POPE:

8 Q. Is that the Avondale litigation?

9 A. Yes.

10 Q. Oh okay. Did you have any dealings with Mr. Ali

11 prior to the Avondale litigation?

12 A. No. We were cordial.

13 Q. Do any of the underlying judgments that form the

14 basis of the complaint have a finding of alter ego?

15 MR. BALLASES: Objection. Form.

16 THE DEPONENT: I don't think so.

17 BY MR. POPE:

18 Q. Do any of the underlying judgments that made the

19 basis of the complaint have any findings of fraudulent

20 transfer?

21 MR. BALLASES: Objection. Form.

22 THE DEPONENT: Not to my knowledge.

23 BY MR. POPE:

24 Q. Do any of those judgments have a finding of

25 fraud?

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203 to 206

<p style="text-align: right;">Page 203</p> <p>1 A. Possibly, but I'm not -- yes, they do.</p> <p>2 Q. Which ones?</p> <p>3 A. I think the third judgment, the Texas REIT</p> <p>4 judgment has a finding of fraud.</p> <p>5 Q. Texas REIT judgment?</p> <p>6 A. Yes. But I don't have it in front of me.</p> <p>7 Q. Do you know whether or not the judgment in the --</p> <p>8 in the Texas REIT case, whether or not it's on appeal?</p> <p>9 A. I think --</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: -- we talked about this. It is.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Earlier I talked about the HREP --</p> <p>14 (Discussion off the record.)</p> <p>15 BY MR. POPE:</p> <p>16 Q. Have you requested any court transcripts from any</p> <p>17 of those underlying judgments?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: I don't know.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Have you personally requested any?</p> <p>22 A. No.</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Other than discovery, which you reviewed bank</p>	<p style="text-align: right;">Page 205</p> <p>1 me hey, should I do business with Ali Choudhri, I'm going</p> <p>2 to say no, so. But am I -- am I actively seeking out</p> <p>3 people to, no. No.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Have you ever paid Wayne Dolcefino any money or</p> <p>6 any consideration?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE DEPONENT: No.</p> <p>9 BY MR. POPE:</p> <p>10 Q. Have you sent any videos to anyone in an effort</p> <p>11 to dissuade them from doing business with Mr. Choudhri or</p> <p>12 any of his entities?</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 THE DEPONENT: What kind of videos?</p> <p>15 BY MR. POPE:</p> <p>16 Q. Videos, just any of the videos produced by Wayne</p> <p>17 Dolcefino?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: I don't think I have, no.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Have you texted any videos that were prepared by</p> <p>22 Wayne Dolcefino to anyone as they relate to Ali Choudhri or</p> <p>23 his entities?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: I don't think so. I may have.</p>
<p style="text-align: right;">Page 204</p> <p>1 statements that were subpoenaed, what other means have you</p> <p>2 used to collect information on Mr. Choudhri or any of the</p> <p>3 named defendants?</p> <p>4 MR. BALLASES: So I'm going to instruct him not</p> <p>5 to answer because that gets into work product and also</p> <p>6 attorney-client.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Before you hired your attorney, did you -- what</p> <p>9 other -- what other means did you use to collect</p> <p>10 information?</p> <p>11 MR. BALLASES: I'll instruct him not to answer to</p> <p>12 the extent it calls for work product.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Have you ever hired a private investigator to</p> <p>15 investigate Mr. Choudhri or his mother?</p> <p>16 A. No, I have not.</p> <p>17 MR. BALLASES: Objection. Form.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Have you ever communicated with anyone in an</p> <p>20 effort to dissuade them from doing business with Mr.</p> <p>21 Choudhri or any of his entities?</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 THE DEPONENT: Have I ever communicated with</p> <p>24 anyone? I mean if someone's going to ask me -- I don't</p> <p>25 know of anyone in particular, but if someone's going to ask</p>	<p style="text-align: right;">Page 206</p> <p>1 I'm not sure.</p> <p>2 BY MR. POPE:</p> <p>3 Q. When would you have done that?</p> <p>4 A. I don't know.</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: They're all over the internet, so</p> <p>7 I don't know.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Have you ever met Wayne Dolcefino?</p> <p>10 A. Yeah, I've met him.</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Have you been to his office?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 THE DEPONENT: I think in the past I have, yes.</p> <p>16 BY MR. POPE:</p> <p>17 Q. When?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: Maybe when he was investigating --</p> <p>20 he was part of some investigation that I was interested in.</p> <p>21 I can't remember which one, but I think I met him at that</p> <p>22 point asking questions about that investigation.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Did you ever ask him questions about Ali Choudhri</p> <p>25 or any of the named defendants?</p>

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207 to 210

<p style="text-align: right;">Page 207</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: Not to my knowledge.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Are you aware of whether you or Mr. Quinlan or</p> <p>5 Mr. Abdullatif have ever paid Wayne Dolcefino for</p> <p>6 information?</p> <p>7 A. No.</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 BY MR. POPE:</p> <p>10 Q. For any reason whatsoever?</p> <p>11 A. Never discussed that.</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Have you ever discussed it and are you aware?</p> <p>15 A. No, I'm not aware of it.</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Have any of the entity defendants made any</p> <p>19 representations or promises to you that turned out to be</p> <p>20 untrue?</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 THE DEPONENT: Not that I'm aware of.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Has Shahnaz Choudhri made any representations or</p> <p>25 promises to you that turned out to be untrue?</p>	<p style="text-align: right;">Page 209</p> <p>1 Q. Have you ever represented him?</p> <p>2 A. Not him, no.</p> <p>3 Q. One of his entities?</p> <p>4 A. No. I was a --</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: -- Treasurer for his son.</p> <p>7 BY MR. POPE:</p> <p>8 Q. A Treasurer?</p> <p>9 A. Yes; for his son's political campaign.</p> <p>10 Q. What's his son's name?</p> <p>11 A. Abraham Javed.</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Do you know Anwar Qadeer?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: Yeah. He's a lawyer.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Outside of that, do you have any personal</p> <p>19 relationship with him?</p> <p>20 A. No.</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Did you ever talk to him about this case?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: No, never.</p>
<p style="text-align: right;">Page 208</p> <p>1 A. Yes.</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: Oh. No. No, she hasn't.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Okay. Have you ever seen any emails written by</p> <p>6 Ali Choudhri that were not obtained through legal</p> <p>7 discovery?</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: I don't understand the question.</p> <p>10 BY MR. POPE:</p> <p>11 Q. Have you ever seen an email from Ali Choudhri</p> <p>12 that wasn't obtained through legal discovery?</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 THE DEPONENT: No.</p> <p>15 BY MR. POPE:</p> <p>16 Q. Do you know Tahir Javed?</p> <p>17 MR. BALLASES: Objection. Form.</p> <p>18 THE DEPONENT: Yes. I do know him.</p> <p>19 BY MR. POPE:</p> <p>20 Q. How do you know him?</p> <p>21 A. He's a friend.</p> <p>22 Q. Do you represent him?</p> <p>23 A. No.</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 BY MR. POPE:</p>	<p style="text-align: right;">Page 210</p> <p>1 BY MR. POPE:</p> <p>2 Q. Or any case that you have -- or any case?</p> <p>3 A. Never.</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 BY MR. POPE:</p> <p>6 Q. Do you know Abdul Kasim?</p> <p>7 A. Yes.</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: His -- his nephew, yes.</p> <p>10 BY MR. POPE:</p> <p>11 Q. Whose nephew?</p> <p>12 A. Mr. Qadeer's.</p> <p>13 Q. Okay. Other than being the nephew, do you have</p> <p>14 any relationship with him?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: He's a friend.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Just a friend. Have you talked to him about Ali</p> <p>19 Choudhri?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: I may -- it may have come up. If</p> <p>22 he asked me any questions about him, I would have told him,</p> <p>23 yes.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Have you talked to him about of the other named</p>

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211 to 214

<p style="text-align: right;">Page 211</p> <p>1 defendants?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: No.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Have you talked to him about this case?</p> <p>6 A. No.</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE REPORTER: I'm sorry. What was the answer?</p> <p>9 THE DEPONENT: No.</p> <p>10 (Pause in the proceedings.)</p> <p>11 BY MR. POPE:</p> <p>12 Q. Are you familiar with any property that Texas</p> <p>13 REIT owns?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 THE DEPONENT: Other than the Westheimer</p> <p>16 property, no.</p> <p>17 BY MR. POPE:</p> <p>18 Q. How did you come to become familiar with the</p> <p>19 Westheimer property?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: I think there's some litigation</p> <p>22 involving Osama Abdullatif.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Are you a named party in that litigation?</p> <p>25 A. I am not.</p>	<p style="text-align: right;">Page 213</p> <p>1 BY MR. POPE:</p> <p>2 Q. Her lawyers. So you are aware that she has filed</p> <p>3 some lis pendens?</p> <p>4 A. I don't know --</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: I don't know that she has</p> <p>7 recently.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Recently. But you're aware that has at some</p> <p>10 point?</p> <p>11 A. At some point she did.</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 BY MR. POPE:</p> <p>14 Q. You represent her, don't you?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: I'm not her primary lawyer.</p> <p>17 BY MR. POPE:</p> <p>18 Q. But you're one of her lawyers?</p> <p>19 A. Yes.</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 BY MR. POPE:</p> <p>22 Q. Do you have a contingency agreement with her?</p> <p>23 A. No.</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 BY MR. POPE:</p>
<p style="text-align: right;">Page 212</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Are you representing anybody in that litigation?</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: I'm not.</p> <p>6 BY MR. POPE:</p> <p>7 Q. Do you know if Hira Azhar has a lis pendens on</p> <p>8 that property?</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 THE DEPONENT: I'm not aware of that.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Have -- have you ever assisted her in filing any</p> <p>13 lis pendens against that property?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 THE DEPONENT: I have not.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Have you ever assisted her in filing any lis</p> <p>18 pendens against any of Mr. Choudhri or the named</p> <p>19 defendants' properties?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: I have not.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Are you aware of someone who has?</p> <p>24 A. Her lawyers.</p> <p>25 MR. BALLASES: Objection. Form.</p>	<p style="text-align: right;">Page 214</p> <p>1 Q. Do you know Bobby Newman?</p> <p>2 A. Yes.</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 BY MR. POPE:</p> <p>5 Q. How do you know Bobby Newman?</p> <p>6 A. He's a lawyer.</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Have you ever paid any attorney's fees for him?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: I don't know about that.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Has he given you ...</p> <p>14 (Discussion off the record.)</p> <p>15 MR. BALLASES: Ready to move onto the next</p> <p>16 witness?</p> <p>17 MR. POPE: Almost.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Are you familiar with Memorial Glen Cove LLC?</p> <p>20 A. I'm sorry. Could you repeat the question?</p> <p>21 Q. Are you familiar with an entity by the name of</p> <p>22 Memorial Glen Cove LLC?</p> <p>23 A. Vaguely. I couldn't tell you what it is.</p> <p>24 Q. How about VGRP Holdings LLC?</p> <p>25 A. That I've seen.</p>

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<p style="text-align: right;">Page 215</p> <p>1 Q. And where have you seen that?</p> <p>2 A. An entity affiliated with Mr. Choudhri.</p> <p>3 Q. Is that something you found on your own before</p> <p>4 the Complaint was filed or you've seen that after, you saw</p> <p>5 it in discovery, post-Complaint?</p> <p>6 A. No. I saw that prior to the Complaint.</p> <p>7 Q. And how did you come across that prior to the</p> <p>8 Complaint?</p> <p>9 A. I think there was a Wayne Dolcefino video on it.</p> <p>10 THE REPORTER: I'm sorry. What was that?</p> <p>11 THE DEPONENT: I think there was a Wayne</p> <p>12 Dolcefino video on it.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Is there a reason why they're not a named</p> <p>15 defendant?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: I have no idea. Should we add</p> <p>18 them?</p> <p>19 BY MR. POPE:</p> <p>20 Q. Is it your contention that every entity that Ali</p> <p>21 Choudhri has a connection with is an alter ego?</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 THE DEPONENT: Perhaps.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Is that your assertion?</p>	<p style="text-align: right;">Page 217</p> <p>1 THE DEPONENT: We have a lot of discovery left to</p> <p>2 do in this case.</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 216</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: It might be.</p> <p>3 (Discussion off the record.)</p> <p>4 BY MR. POPE:</p> <p>5 Q. Which transfers are you hoping to avoid?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: Sitting here today, I couldn't</p> <p>8 tell you. Any -- any transfer that results in my judgment</p> <p>9 not being paid, and that's meant to --</p> <p>10 BY MR. POPE:</p> <p>11 Q. Which transfer is that?</p> <p>12 A. Any transfer --</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 THE DEPONENT: -- that is meant to evade a</p> <p>15 creditor's judgment.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Well, which transfer is that?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: I don't know. I have to look.</p> <p>20 BY MR. POPE:</p> <p>21 Q. So after your review of all the bank statements</p> <p>22 in discovery, you still don't know which transfers?</p> <p>23 A. Correct.</p> <p>24 Q. Right?</p> <p>25 MR. BALLASES: Objection. Form.</p>	

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218 to 221

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1 BY MR. POPE:

2 Q. In your opinion as a layperson, not as an

3 attorney, how would you -- what is your definition of the

4 concept of commingling?

5 MR. BALLASES: Objection. Form.

6 THE DEPONENT: That calls for a legal conclusion.

7 BY MR. POPE:

8 Q. Do you have any personal knowledge of any benefit

9 any of the named defendants would have received from these

10 alleged fraudulent transfers?

11 MR. BALLASES: Objection. Form.

12 THE DEPONENT: No.

13 BY MR. POPE:

14 Q. Are any of the alleged transfers outside of the

15 statute of limitations?

16 MR. BALLASES: Objection. Form.

17 THE DEPONENT: I don't think so.

18 BY MR. POPE:

19 Q. How far back do the bank statements go that you

20 received?

21 MR. BALLASES: Objection. Form.

22 THE DEPONENT: I'm not sure, to be honest with

23 you.

24 BY MR. POPE:

25 Q. What banks did you request bank statements from?

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1 MR. BALLASES: Objection. Form.

2 THE DEPONENT: I don't have them in front of me.

3 Numerous.

4 BY MR. POPE:

5 Q. Is Galleria Loop Loop Note Holder a judgment

6 debtor to any of your judgments?

7 MR. BALLASES: Objection. Form.

8 THE DEPONENT: I think so.

9 BY MR. POPE:

10 Q. Which one?

11 A. I -- I don't know. I'm not -- I'm not 100

12 percent sure. There's -- there's a lot.

13 Q. What evidence do you have that the defendants did

14 not operate independently of each other?

15 MR. BALLASES: Objection. Form.

16 THE DEPONENT: Again, would have to review the

17 voluminous documents that show that assets were commingled,

18 funds were commingled, you know, one creditor's -- excuse

19 me -- one debtor's bills are being paid by another's, that

20 kind of stuff.

21 BY MR. POPE:

22 Q. Did you review any corporate documents of any of

23 the named defendant entities before retaining Hoover

24 Slovacek?

25 A. I may have. I'm not sure.

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1 Q. During your investigation, did you find that the

2 defendants kept separate bank accounts?

3 MR. BALLASES: Objection. Form.

4 THE DEPONENT: Separate bank accounts? What do

5 you mean by that?

6 BY MR. POPE:

7 Q. That Jetall had a bank account and that Arabella

8 had a bank account and that 2727 Kirby had a bank account.

9 Did you find that they were all signatures on all of the

10 bank accounts?

11 MR. BALLASES: Objection. Form.

12 THE DEPONENT: I don't know about all. That's

13 pretty broad, but I think what we found is that one entity

14 is paying for another entity's payroll; one entity is

15 writing checks to another entity for whatever the purpose

16 is. I don't know what the purpose was.

17 BY MR. POPE:

18 Q. How did you determine that that was happening

19 between one entity and another entity? Did you find that

20 they had separate bank accounts?

21 MR. BALLASES: Objection. Form.

22 THE DEPONENT: Some of them had separate. Some

23 of them of them did, yes.

24 BY MR. POPE:

25 Q. Which ones had separate bank accounts?

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1 A. I don't know off the top of my head. There's

2 dozens of defendants here.

3 Q. Were there dozens of bank accounts that you

4 reviewed?

5 A. Possibly.

6 Q. More than 10?

7 A. I don't -- I don't know if there were more than

8 10.

9 Q. Not more than 10 bank accounts?

10 A. Not sure, to be honest with you.

11 Q. Have you ever stated to anyone that you want to

12 get Ali Choudhri indicted?

13 MR. BALLASES: Objection. Form.

14 THE DEPONENT: Indicted? No. He can do that all

15 by himself.

16 BY MR. POPE:

17 Q. From your review of those bank statements, how

18 were the finances of each defendant managed?

19 MR. BALLASES: Objection. Form.

20 THE DEPONENT: I'm sorry? How were the finances?

21 BY MR. POPE:

22 Q. Yeah, managed.

23 A. I would imagine poorly, since some of them got

24 foreclosed on.

25 Q. Have you brought up or contacted any authority

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<p style="text-align: right;">Page 222</p> <p>1 about any of these alleged fraudulent transfers?</p> <p>2 A. No.</p> <p>3 MR. BALLASES: Objection.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Contact the police?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Or the FBI, or anyone?</p> <p>9 A. No. Are there crimes being committed here?</p> <p>10 Q. Have you spoken to Mr. Gil, or do you know</p> <p>11 Mr.</p> <p>12 Gil?</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 THE DEPONENT: Mr. Gil, I think is one of the</p> <p>15 civil lawyers at the Department of Justice.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Have you spoken to him?</p> <p>18 A. I don't know if I'm able to get into that.</p> <p>19 Q. How do you know him?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: Because I know that he's on the</p> <p>22 petitions that have been filed against Mr. Choudhri.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Did you provide him any documents?</p> <p>25 MR. BALLASES: Objection. Form.</p> <p>THE DEPONENT: I wouldn't -- I'm not -- I don't</p>	<p style="text-align: right;">Page 224</p> <p>1 MR. BALLASES: Objection. Form. To the extent</p> <p>2 --</p> <p>3 THE DEPONENT: Didn't we cover this already?</p> <p>4 MR. BALLASES: Well, that's why I object to the</p> <p>5 form. But to the extent it gets into attorney-client</p> <p>6 privilege or attorney work product privilege, I'm</p> <p>7 instructing you not to divulge that information.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Have you ever filed a lis pendens that was</p> <p>10 challenged and found to be improper?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: I think maybe in one of the cases</p> <p>13 that we had, there was an improper lis pendens, or there</p> <p>14 was a determination that the lis pendens should be removed,</p> <p>15 yes. Unfortunately, it was an incorrect decision, but --</p> <p>16 BY MR. POPE:</p> <p>17 Q. Did you appeal the decision?</p> <p>18 A. I didn't.</p> <p>19 Q. Was it a case involving one of the named</p> <p>20 defendants?</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 THE DEPONENT: No. This was a -- yeah, it was.</p> <p>23 Yes.</p> <p>24 BY MR. POPE:</p> <p>25 Q. And it was a lis pendens that you caused to be</p>
<p style="text-align: right;">Page 223</p> <p>1 think I'm allowed to get into that. I'm not sure if I'm</p> <p>2 able to.</p> <p>3 MR. POPE: Can you mark the answer to that</p> <p>4 question --</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 MR. POPE: -- possibly for certification?</p> <p>7 THE REPORTER: Yes, sir.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Do you have any evidence showing that Jetall</p> <p>10 Companies failed to maintain separate books --</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 BY MR. POPE:</p> <p>13 Q. -- from the other entities, separate from the</p> <p>14 other entities?</p> <p>15 A. I don't have it. I think there's discovery that</p> <p>16 remains to be done.</p> <p>17 Q. Before you filed this complaint, did you have any</p> <p>18 evidence of -- that Shahnaz Choudhri did not maintain</p> <p>19 separate books from the other named defendants?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: I don't know that. I don't think</p> <p>22 we have that, no. I don't know that I have that.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Can you walk me through the steps you took to</p> <p>25 verify your right to file those lis pendentas?</p>	<p style="text-align: right;">Page 225</p> <p>1 filed that was removed in that litigation?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: Yes.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Do you know what a fraudulent lien is?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: Fraudulent lien? A lien that's</p> <p>8 filed fraudulent, I think.</p> <p>9 BY MR. POPE:</p> <p>10 Q. Have you taken the time to calculate the amount</p> <p>11 of damages that you believe you are owed individually?</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Not in total filed the three of you, but what you</p> <p>15 are owed individually?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: I haven't, but I generally believe</p> <p>18 it would be a third of the judgment.</p> <p>19 BY MR. POPE:</p> <p>20 Q. You only have an interest in two of the three?</p> <p>21 A. Yes. That's what I meant.</p> <p>22 Q. Okay. At the time the lawsuit was filed, did you</p> <p>23 have any knowledge of how the entities named as defendants</p> <p>24 were formed?</p> <p>25 MR. BALLASES: Objection. Form.</p>

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<p style="text-align: right;">Page 226</p> <p>1 THE DEPONENT: I don't understand the question.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Did you know who formed them, who the members</p> <p>4 were before you named them as defendants?</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: Do I know who formed the</p> <p>7 entities --</p> <p>8 BY MR. POPE:</p> <p>9 Q. -- before you filed your complaint?</p> <p>10 A. -- before I filed my complaint? I don't know</p> <p>11 what that means.</p> <p>12 Q. Did you know who owned the entities before you</p> <p>13 filed your complaint?</p> <p>14 A. I mean, I suspect we --</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: Yes. I mean, it would be public</p> <p>17 record.</p> <p>18 BY MR. POPE:</p> <p>19 Q. But did you know?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: Except the ones that were Wyoming,</p> <p>22 because I think there's a Wyoming entity that we didn't</p> <p>23 know. And the purpose of that Wyoming entity is to conceal</p> <p>24 who the member is. But the other ones, I -- you know, we</p> <p>25 did our general research, yes.</p>	<p style="text-align: right;">Page 228</p> <p>1 affiliated with the entity.</p> <p>2 BY MR. POPE:</p> <p>3 Q. And how do you know that?</p> <p>4 A. The litigation against Mr. Choudhri, public</p> <p>5 record.</p> <p>6 Q. Which litigation gave you that information?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE DEPONENT: I think that was in Dalio Holdings</p> <p>9 litigation or the MBK litigation. I can't remember.</p> <p>10 There's been -- I mean, there's voluminous lawsuits.</p> <p>11 BY MR. POPE:</p> <p>12 Q. So do you know who formed Dalio Holdings I?</p> <p>13 A. I don't.</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 BY MR. POPE:</p> <p>16 Q. Do you know who its members are?</p> <p>17 A. I don't sitting here today.</p> <p>18 Q. Do you know who formed Dalio Holdings II?</p> <p>19 MR. BALLASES: Objection. Form.</p> <p>20 THE DEPONENT: It wasn't Ray Dalio.</p> <p>21 BY MR. POPE:</p> <p>22 Q. Do you know who its members are?</p> <p>23 A. I don't.</p> <p>24 Q. Do you know who Azeemeh Zaheer is?</p> <p>25 A. I do.</p>
<p style="text-align: right;">Page 227</p> <p>1 BY MR. POPE:</p> <p>2 Q. When you say we did our general research, who's</p> <p>3 the we?</p> <p>4 A. We meaning --</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: We as in the royal we.</p> <p>7 BY MR. POPE:</p> <p>8 Q. The royal we?</p> <p>9 A. Yes.</p> <p>10 Q. Explain the royal we.</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: The royal we is we but singular.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Never been a royal. When did you first become</p> <p>15 aware of the corporate structure for Jetall Companies?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: Maybe 2013.</p> <p>18 BY MR. POPE:</p> <p>19 Q. And how did you become aware of that?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: Just researched it. It's gone</p> <p>22 through may iterations over the years. So sometimes</p> <p>23 Shahnaz Choudhri's part of it and sometimes his father was</p> <p>24 a part of it. Sometimes Brad Parker was a part of it. So</p> <p>25 there's been various people, people with agency agreements</p>	<p style="text-align: right;">Page 229</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Who is she?</p> <p>4 A. She is a former business partner of Ali.</p> <p>5 Q. And how do you know that?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: She -- she has got a lot of</p> <p>8 litigation against him.</p> <p>9 BY MR. POPE:</p> <p>10 Q. How did you meet her?</p> <p>11 A. I met her in the context of her coming to me</p> <p>12 complaining about him.</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 BY MR. POPE:</p> <p>15 Q. She came to you as a -- looking for legal counsel</p> <p>16 or as a friend?</p> <p>17 A. Legal counsel. Legal counsel.</p> <p>18 Q. When?</p> <p>19 A. Not too long ago, I think 20 -- maybe '22, '23,</p> <p>20 something like that.</p> <p>21 Q. Are you aware of her having any agency agreements</p> <p>22 with any of the named defendants?</p> <p>23 A. Yes. Yes, with him.</p> <p>24 Q. With Mr. Choudhri individually?</p> <p>25 A. With Mr. Choudhri, mm-hmm.</p>

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<p style="text-align: right;">Page 230</p> <p>1 Q. Did she form any companies for him?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: I don't know about all that.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Did she form Dalio I?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: Could be.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Did she form Dalio Holdings II?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: Could possibly. I don't know.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Has she ever been an agent of Ali Choudhri?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 THE DEPONENT: It appears she was at some point.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Has she ever been an agent for any of the other</p> <p>18 entities?</p> <p>19 MR. BALLASES: Objection. Form.</p> <p>20 THE DEPONENT: I -- I think she has been, yes.</p> <p>21 BY MR. POPE:</p> <p>22 Q. Is there a reason why she's not a named</p> <p>23 defendant?</p> <p>24 A. Not sure, to be honest with you.</p> <p>25 Q. Do you have some side agreement with her?</p>	<p style="text-align: right;">Page 232</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: No.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Okay. Other than what's currently stated in your</p> <p>5 pleadings, are you aware of any other theories of alter ego</p> <p>6 or any other claims that you plan to bring in this case?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE DEPONENT: I mean, I can't predict the</p> <p>9 future. If I find out assets are being transferred to</p> <p>10 someone else, we're going to have to make those claims.</p> <p>11 BY MR. POPE:</p> <p>12 Q. But are you aware of any right now as you sit</p> <p>13 here today?</p> <p>14 A. No, not right now.</p> <p>15 Q. Are there any additional factors or reasons that</p> <p>16 you haven't disclosed in your pleading that you're going to</p> <p>17 rely upon to pursue these claims?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 To the extent you -- your question gets into</p> <p>20 attorney-client or work product, legal privileges, then I</p> <p>21 would instruct the witness not to divulge that information.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Are you aware of any other facts related to this</p> <p>24 case that are not pled in your pleadings?</p> <p>25 A. I mean, I think we have people to depose.</p>
<p style="text-align: right;">Page 231</p> <p>1 A. No.</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Do you have any contingency agreement with her?</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: No contingency.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Do you have any agency agreements with her?</p> <p>9 A. No.</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Do you have any agency agreements with any of her</p> <p>13 entities?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 THE DEPONENT: No.</p> <p>16 BY MR. POPE:</p> <p>17 Q. What entities does she have?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: I'm not aware of any.</p> <p>20 BY MR. POPE:</p> <p>21 Q. You're not aware of any?</p> <p>22 A. No. I think Naissance Galleria. That's one of</p> <p>23 hers.</p> <p>24 Q. Naissance Galleria? Okay. Does she have any</p> <p>25 other entities that you're aware of?</p>	<p style="text-align: right;">Page 233</p> <p>1 THE REPORTER: I'm sorry, what was that?</p> <p>2 THE DEPONENT: We still have people to depose in</p> <p>3 this case.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Well, as you sit here today, are you aware of any</p> <p>6 additional facts that are not pled in your --</p> <p>7 A. I don't know -- what --</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: -- I don't know, as Donald</p> <p>10 Rumsfeld said.</p> <p>11 BY MR. POPE:</p> <p>12 Q. So the answer's no?</p> <p>13 A. The answer is no.</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 BY MR. POPE:</p> <p>16 Q. Do you know Quanell X?</p> <p>17 MR. BALLASES: Objection. Form.</p> <p>18 THE DEPONENT: Generally, yes.</p> <p>19 BY MR. POPE:</p> <p>20 Q. How do you know him?</p> <p>21 A. He's on TV.</p> <p>22 Q. Other than being on TV, do you know him outside</p> <p>23 of that?</p> <p>24 A. I don't know. I've said hi and bye to him a few</p> <p>25 times.</p>

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<p style="text-align: right;">Page 234</p> <p>1 Q. Have you ever sent a text to him?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: Quanell?</p> <p>4 BY MR. POPE:</p> <p>5 Q. Mm-hmm.</p> <p>6 A. I think maybe I have, yes.</p> <p>7 Q. Emails?</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: No, never -- never emailed him.</p> <p>10 Does he have any? I don't know if he has one.</p> <p>11 BY MR. POPE:</p> <p>12 Q. What was the nature of the text?</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 THE DEPONENT: It was a -- I think it was a</p> <p>15 community-type deal, like maybe someone in the Muslim</p> <p>16 community that needed help or something like that,</p> <p>17 community work.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Did you ever text him about Chris Wyatt?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: Chris Wyatt? No.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Did you ever text him about Ali Choudhri?</p> <p>24 A. Never.</p> <p>25 MR. BALLASES: Objection. Form.</p>	<p style="text-align: right;">Page 236</p> <p>1 Q. You were representing Chris Wyatt in that</p> <p>2 proceeding?</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 THE DEPONENT: I was, yes.</p> <p>5 BY MR. POPE:</p> <p>6 Q. And Azeemeh Zaheer?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE REPORTER: I'm sorry. What was that?</p> <p>9 BY MR. POPE:</p> <p>10 Q. Did you also represent Azeemeh Zaheer?</p> <p>11 A. Yes.</p> <p>12 THE REPORTER: I'm sorry. If I can please get</p> <p>13 one at a time for a clear record.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Did you also represent Azeemeh Zaheer in that</p> <p>16 proceeding?</p> <p>17 MR. BALLASES: Objection. Form.</p> <p>18 THE DEPONENT: Yes.</p> <p>19 BY MR. POPE:</p> <p>20 Q. So you represented both Chris Wyatt and Azeemeh</p> <p>21 Zaheer at that proceeding?</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 THE DEPONENT: I can't remember if it was the</p> <p>24 same hearing, but yes, I represented both of them.</p> <p>25 MR. BALLASES: Ready for Number 2?</p>
<p style="text-align: right;">Page 235</p> <p>1 BY MR. POPE:</p> <p>2 Q. Did you text him about Ali Choudhri's entity or</p> <p>3 any of the entity defendants?</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: No, no, never.</p> <p>6 BY MR. POPE:</p> <p>7 Q. When did that text take place?</p> <p>8 A. My text?</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 BY MR. POPE:</p> <p>11 Q. To Mr. Quanell?</p> <p>12 A. I think it was a few years ago. I can't</p> <p>13 remember. Nothing related to this case at all.</p> <p>14 Q. Have you ever been present when Quanell X has</p> <p>15 given testimony in a court?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: I think I was once, yeah, Judge</p> <p>18 Manor's court.</p> <p>19 BY MR. POPE:</p> <p>20 Q. Judge Manor's court?</p> <p>21 A. Sorry?</p> <p>22 Q. Judge Manor's court?</p> <p>23 A. Yes. Yeah.</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 BY MR. POPE:</p>	<p style="text-align: right;">Page 237</p> <p>1 MR. POPE: Not quite. I think I need to take a</p> <p>2 five-minute break to make sure the camera man can leave his</p> <p>3 stuff here. He asked that question. We had not cleared</p> <p>4 that up. I want to make sure he doesn't have an issue with</p> <p>5 that. He did ask me to make sure he could leave it there.</p> <p>6 THE VIDEOGRAPHER: All parties agree we're going</p> <p>7 off the record.</p> <p>8 THE REPORTER: Stand by one moment while we go</p> <p>9 off.</p> <p>10 THE VIDEOGRAPHER: We're going off record at 5:08</p> <p>11 p.m.</p> <p>12 (WHEREUPON, a recess was taken.)</p> <p>13 THE VIDEOGRAPHER: Going back on the record at</p> <p>14 5:24 p.m.</p> <p>15 BY MR. POPE:</p> <p>16 Q. Mr. Khawaja, so have you spoken to anyone at the</p> <p>17 Houston Police Department about Ali Choudhri?</p> <p>18 A. No.</p> <p>19 MR. BALLASES: Objection. Form.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Have you spoken to any constable about Ali</p> <p>22 Choudhri?</p> <p>23 A. No.</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 BY MR. POPE:</p>

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<p style="text-align: right;">Page 238</p> <p>1 Q. Anyone at the U.S. DOJ?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: No.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Anyone in the Civil Division of U.S. DOJ?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: If I did, I'm not sure if I'm able</p> <p>8 to disclose that.</p> <p>9 BY MR. POPE:</p> <p>10 Q. If you did, who would it be?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: If I was able to disclose that, I</p> <p>13 would.</p> <p>14 BY MR. POPE:</p> <p>15 Q. So are you refusing to answer that question?</p> <p>16 A. I'm not going to answer that question.</p> <p>17 Q. You're not going to answer that question.</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 BY MR. POPE:</p> <p>20 Q. Is there a reason why you're not going to answer</p> <p>21 that question?</p> <p>22 A. It could be subject to some sort of</p> <p>23 confidentiality.</p> <p>24 Q. Between you and whom?</p> <p>25 MR. BALLASES: The government investigating him.</p>	<p style="text-align: right;">Page 240</p> <p>1 A. Yes.</p> <p>2 Q. What type of lawyer is he?</p> <p>3 A. Prosecutor --</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: Prosecutor with the Department of</p> <p>6 Justice.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Prosecutor with the Department of Justice. Which</p> <p>9 division?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: I think he's the District Attorney</p> <p>12 for the Southern District now.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Okay.</p> <p>15 A. Or he's a U.S. Attorney for the Southern</p> <p>16 District.</p> <p>17 Q. And what did you talk to him about?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: He's a friend.</p> <p>20 BY MR. POPE:</p> <p>21 Q. He's a friend?</p> <p>22 A. Yes.</p> <p>23 Q. Have you talked to him about Ali Choudhri?</p> <p>24 A. No.</p> <p>25 MR. BALLASES: Objection. Form.</p>
<p style="text-align: right;">Page 239</p> <p>1 THE DEPONENT: Yeah. Exactly.</p> <p>2 MS. MACGEORGE: Are we answering for our</p> <p>3 deponents --</p> <p>4 MR. BALLASES: I was just helping him.</p> <p>5 MS. MACGEORGE: -- or are we letting our</p> <p>6 deponents answer?</p> <p>7 MR. BALLASES: I was just answering for him.</p> <p>8 MS. MACGEORGE: I don't think we get to answer</p> <p>9 for our deponents. Let's let our deponents answer the</p> <p>10 questions.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Between you and whom?</p> <p>13 A. A government agency.</p> <p>14 Q. Which agency?</p> <p>15 A. Department of Justice.</p> <p>16 Q. Okay. Have you communicated in any way with a</p> <p>17 Mr. Hamdani?</p> <p>18 A. No.</p> <p>19 MR. BALLASES: Objection. Form.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Do you know Mr. Hamdani?</p> <p>22 A. Yes.</p> <p>23 Q. How do you know Mr. Hamdani?</p> <p>24 A. He's a lawyer in the community.</p> <p>25 Q. A lawyer in the community?</p>	<p style="text-align: right;">Page 241</p> <p>1 BY MR. POPE:</p> <p>2 Q. Have you talked to him about any of the other</p> <p>3 named defendants?</p> <p>4 A. No.</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 BY MR. POPE:</p> <p>7 Q. Has your client here sued over 30 defendants?</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: I don't know about that.</p> <p>10 BY MR. POPE:</p> <p>11 Q. Has she sued more than 20 defendants?</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 THE DEPONENT: No clue.</p> <p>14 BY MR. POPE:</p> <p>15 Q. No clue? Do you know Jeff Vise?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: Yes, I do.</p> <p>18 BY MR. POPE:</p> <p>19 Q. How do you know Jeff Vise?</p> <p>20 A. He's a public adjuster.</p> <p>21 Q. Public adjuster. Have you had any discussions</p> <p>22 about Ali Choudhri with Mr. Vise?</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 THE DEPONENT: I think he may have asked me about</p> <p>25 doing business with him or his opinion of him.</p>

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<p style="text-align: right;">Page 242</p> <p>1 BY MR. POPE:</p> <p>2 Q. And what did you say?</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 THE DEPONENT: I said what I would tell anybody.</p> <p>5 Be careful.</p> <p>6 BY MR. POPE:</p> <p>7 Q. And when did you guys have that conversation?</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: Maybe -- maybe last year sometime.</p> <p>10 BY MR. POPE:</p> <p>11 Q. Before or after you filed the complaint?</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 THE DEPONENT: I -- I think it would have been</p> <p>14 after.</p> <p>15 BY MR. POPE:</p> <p>16 Q. After. Okay. Have you talked to Mr. Vise about</p> <p>17 any of the other named defendants?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: No.</p> <p>20 BY MR. POPE:</p> <p>21 Q. How long have you known Mr. Vise?</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 THE DEPONENT: I've known him for -- probably</p> <p>24 since 2013, 2014.</p> <p>25 BY MR. POPE:</p>	<p style="text-align: right;">Page 244</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: Not going to discuss that.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Do you know Mr. Shaitelman?</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: I know that he's a prosecutor, or</p> <p>7 a civil prosecutor on his case.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Do you know Mr. Gil's occupation?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: Same thing, civil prosecutor.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Have you sent any emails to either of those</p> <p>14 individuals?</p> <p>15 A. Not to my knowledge.</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Sent any text messages to either of those</p> <p>19 individuals?</p> <p>20 A. No.</p> <p>21 THE REPORTER: If I can please get one at at</p> <p>22 time. I'm starting to get some overlap, please.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Have you sent any documents to either of those</p> <p>25 individuals?</p>
<p style="text-align: right;">Page 243</p> <p>1 Q. How long have you known Mr. Hamdani?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: I've known him longer. I've known</p> <p>4 him since like 2005. Since 9/11, actually.</p> <p>5 BY MR. POPE:</p> <p>6 Q. How long have you known Mr. Gil?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE DEPONENT: I wouldn't be able to talk about</p> <p>9 that.</p> <p>10 BY MR. POPE:</p> <p>11 Q. You can't talk about how long you've known</p> <p>12 Mr. Gil?</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 THE REPORTER: I'm sorry. Could I get a verbal</p> <p>15 answer for that?</p> <p>16 THE DEPONENT: Yes. I -- I'm not going to</p> <p>17 discuss that.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Do you have a confidentiality agreement with</p> <p>20 Mr. Gil?</p> <p>21 A. I don't know.</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Do you have a confidentiality agreement with</p> <p>25 Mr. Shaitelman?</p>	<p style="text-align: right;">Page 245</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: Not that I recall, no.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Have you provided any documents to those</p> <p>5 individuals?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: Actually, I'm not going to answer</p> <p>8 any questions about that.</p> <p>9 BY MR. POPE:</p> <p>10 Q. Why not?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: Because I'm not going to.</p> <p>13 BY MR. POPE:</p> <p>14 Q. You don't have a confidentiality agreement with</p> <p>15 either one, right?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: I don't know about that.</p> <p>18 BY MR. POPE:</p> <p>19 Q. You don't know. Have you signed any agreements</p> <p>20 with either one of them?</p> <p>21 A. No.</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 BY MR. POPE:</p> <p>24 Q. So you haven't signed any agreements, so then you</p> <p>25 would not have a confidentiality agreement; wouldn't that</p>

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<p style="text-align: right;">Page 246</p> <p>1 be correct?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: Look, we can take it up with the</p> <p>4 judge, Mr. Pope. I'm not going to talk about that. So do</p> <p>5 you want to call the judge, we can call the judge.</p> <p>6 BY MR. POPE:</p> <p>7 Q. So you're going to refuse to answer?</p> <p>8 A. I'm refusing to answer that question or any line</p> <p>9 of questioning related to the Department of Justice.</p> <p>10 THE REPORTER: And just as a reminder, counsel,</p> <p>11 for a clear record, I will need one at a time so that each</p> <p>12 person is heard.</p> <p>13 MR. BALLASES: Sure. Give me some time to</p> <p>14 object.</p> <p>15 THE DEPONENT: Sure. Sorry.</p> <p>16 MR. BALLASES: Thank you.</p> <p>17 BY MR. POPE:</p> <p>18 Q. So last question, then I'm moving on, just to</p> <p>19 make sure it's clear for the record. You're refusing to</p> <p>20 answer any questions regarding Mr. Gil or Mr. Shaitelman?</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 THE DEPONENT: That's correct.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Okay. So let's move back to Mr. Hamdani. Did</p> <p>25 you ever tell us what his occupation was?</p>	<p style="text-align: right;">Page 248</p> <p>1 A. Never.</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Have you ever sent him a text regarding any of</p> <p>5 the named defendants?</p> <p>6 A. No.</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Any entity that's owned by Ali Choudhri that may</p> <p>10 not be a named defendant, have you ever sent him a text</p> <p>11 regarding that?</p> <p>12 A. I have not.</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Do you keep all your text message?</p> <p>16 A. I do.</p> <p>17 Q. How many phones do you have?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: I just have one.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Does your company keep a cell phone, or does</p> <p>22 either of your companies keep a cell phone?</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 THE DEPONENT: No. I mean, for me? No.</p> <p>25 BY MR. POPE:</p>
<p style="text-align: right;">Page 247</p> <p>1 A. He's the --</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: -- U.S. Attorney for the Southern</p> <p>4 District of Texas.</p> <p>5 BY MR. POPE:</p> <p>6 Q. And have you ever sent any documents to</p> <p>7 Mr. Hamdani?</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: Never.</p> <p>10 BY MR. POPE:</p> <p>11 Q. Have you ever sent any emails to Mr. Hamdani?</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 THE DEPONENT: No.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Have you ever texted Mr. Hamdani?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: Never. Regarding this case?</p> <p>18 BY MR. POPE:</p> <p>19 Q. In general.</p> <p>20 A. I mean, he's a friend. I can -- I communicate</p> <p>21 with my friends.</p> <p>22 Q. Oh, he's a friend.</p> <p>23 A. Yes.</p> <p>24 Q. I forgot that one was a friend. Okay. So have</p> <p>25 you ever sent him a text regarding this case?</p>	<p style="text-align: right;">Page 249</p> <p>1 Q. Is Jeff Vise also a friend, or just --</p> <p>2 A. Yeah, he's a friend.</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Have you ever given Jeff Vise any documents</p> <p>6 relating to this case?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE DEPONENT: Never.</p> <p>9 BY MR. POPE:</p> <p>10 Q. Have you ever given Jeff Vise any documents</p> <p>11 related to Ali Choudhri?</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 THE DEPONENT: I don't think so, no.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Any documents related to any of the named</p> <p>16 defendants?</p> <p>17 MR. BALLASES: Objection. Form.</p> <p>18 THE DEPONENT: Not to my knowledge.</p> <p>19 BY MR. POPE:</p> <p>20 Q. And what was his occupation again?</p> <p>21 A. He's a public adjuster.</p> <p>22 Q. Public adjuster.</p> <p>23 MR. BALLASES: Object to the form.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Do you have any business dealings with Mr. Vise?</p>

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<p style="text-align: right;">Page 250</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: I think -- he refers me to work.</p> <p>3 BY MR. POPE:</p> <p>4 Q. As an attorney or as one of your business</p> <p>5 interests?</p> <p>6 A. As an attorney.</p> <p>7 Q. Okay. Other than referring you work, do you have</p> <p>8 any business dealings with him? Is he a partner to any of</p> <p>9 your entities?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: Not a partner. I've sent him work</p> <p>12 as well.</p> <p>13 BY MR. POPE:</p> <p>14 Q. As a public adjuster?</p> <p>15 A. Correct.</p> <p>16 Q. Do you know Amir Zaman?</p> <p>17 MR. BALLASES: Objection. Form.</p> <p>18 THE DEPONENT: Yes. He's my brother-in-law.</p> <p>19 BY MR. POPE:</p> <p>20 Q. He's your brother-in-law. Okay. What's his</p> <p>21 occupation?</p> <p>22 A. He's a public adjuster.</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 BY MR. POPE:</p> <p>25 Q. He's also a public adjuster. Same -- along with</p>	<p style="text-align: right;">Page 252</p> <p>1 THE DEPONENT: I have not.</p> <p>2 BY MR. POPE:</p> <p>3 Q. I think I asked you had you sent any texts to</p> <p>4 Mr. Vise, but has Mr. Vise sent any texts to you about Ali</p> <p>5 Choudhri?</p> <p>6 A. He has not.</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 BY MR. POPE:</p> <p>9 Q. And the same thing with Mr. Hamdani. Has he sent</p> <p>10 any texts to you about Mr. Choudhri?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: Never.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Has he went any emails to you about Mr. Choudhri?</p> <p>15 A. Never done that.</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE REPORTER: I'm sorry. I didn't catch your</p> <p>18 answer, sir.</p> <p>19 THE DEPONENT: Never done that, either. Sorry.</p> <p>20 BY MR. POPE:</p> <p>21 Q. What kind of phone do you have?</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 THE DEPONENT: iPhone.</p> <p>24 BY MR. POPE:</p> <p>25 Q. How long have you had that particular iPhone</p>
<p style="text-align: right;">Page 251</p> <p>1 Mr. Vise, or are they separate?</p> <p>2 A. They're separate.</p> <p>3 Q. They're separate. Have any business ventures</p> <p>4 with Mr. Zaman?</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: No, not particularly. I mean, I</p> <p>7 work with him.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Has he ever been a member of any of your</p> <p>10 entities?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: No, he hasn't.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Have you ever talked to him about Mr. Choudhri?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: I mean, generally.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Have you talked to him about Mr. Choudhri as it</p> <p>19 pertains to this case?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: This case? No.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Have you talked to him about Mr. Choud -- any of</p> <p>24 the other named defendants?</p> <p>25 MR. BALLASES: Objection. Form.</p>	<p style="text-align: right;">Page 253</p> <p>1 that's in your possession now?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: Maybe a year or so.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Have you had any real estate deals with</p> <p>6 Mr. Zaman, your brother-in-law?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE DEPONENT: No.</p> <p>9 BY MR. POPE:</p> <p>10 Q. Does he have any interest in any judgments that</p> <p>11 are subject of this lawsuit?</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 THE DEPONENT: No, he does not.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Do you have any agreements with him to share any</p> <p>16 of the funds you may recover from any of the judgments you</p> <p>17 have against Mr. Choudhri?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: Not at all.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Do you pay referral fees?</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 THE DEPONENT: No.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Have you gotten referral fees?</p>

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<p style="text-align: right;">Page 254</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: Yes. I do pay referral fees, yes,</p> <p>3 I do.</p> <p>4 BY MR. POPE:</p> <p>5 Q. You do pay referral fees?</p> <p>6 A. Yes.</p> <p>7 Q. Have you also received referral fees?</p> <p>8 MR. BALLASES: Objection. Form.</p> <p>9 THE DEPONENT: Yes.</p> <p>10 BY MR. POPE:</p> <p>11 Q. Do you know Bobby Newman?</p> <p>12 A. Yes.</p> <p>13 MR. BALLASES: Objection. Form.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Who is he?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: He's a lawyer.</p> <p>18 BY MR. POPE:</p> <p>19 Q. What kind of lawyer is he?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: He's a family law attorney.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Have you ever paid him a referral fee?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: I may have. I'm not sure, to be</p>	<p style="text-align: right;">Page 256</p> <p>1 Q. Did you get a referral fee from that?</p> <p>2 A. I did not on that, no.</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Did she ultimately retain him?</p> <p>6 A. She did retain.</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 BY MR. POPE:</p> <p>9 Q. In a case against Mr. Choudhri?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: Yes.</p> <p>12 BY MR. POPE:</p> <p>13 Q. In a case against any of the other named</p> <p>14 defendants or just Mr. Choudhri?</p> <p>15 A. Just Mr. Choudhri.</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 BY MR. POPE:</p> <p>18 Q. It's a family law case, I'm assuming?</p> <p>19 A. Divorce case.</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 BY MR. POPE:</p> <p>22 Q. Have you talked to Mr. Newman about Mr. Choudhri?</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 THE DEPONENT: I mean, if I did, it would have</p> <p>25 been in the context of attorney-client sort of discussions,</p>
<p style="text-align: right;">Page 255</p> <p>1 honest with you.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Has he ever paid you a referral fee?</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: He has.</p> <p>6 BY MR. POPE:</p> <p>7 Q. For what?</p> <p>8 A. For cases I've referred to him.</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 BY MR. POPE:</p> <p>11 Q. Which cases?</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 THE DEPONENT: I -- there's been so many. I</p> <p>14 don't know.</p> <p>15 BY MR. POPE:</p> <p>16 Q. Have you referred any cases to him from Azeemeh</p> <p>17 Zaheer?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: No, not to my knowledge, no.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Hira Azhar?</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 THE DEPONENT: She met with him, yes. She did</p> <p>24 meet with him.</p> <p>25 BY MR. POPE:</p>	<p style="text-align: right;">Page 257</p> <p>1 so --</p> <p>2 BY MR. POPE:</p> <p>3 Q. Okay. Have you talked to Mr. Newman about any of</p> <p>4 the other named defendants?</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: I mean, I wouldn't be able to get</p> <p>7 into that.</p> <p>8 BY MR. POPE:</p> <p>9 Q. What year did you refer -- or when -- what year</p> <p>10 did you refer Hira Azhar to Bobby Newman?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: Whenever they filed a divorce at</p> <p>13 that time.</p> <p>14 BY MR. POPE:</p> <p>15 Q. Do you know Terry Fisher?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: Terry Fisher? Yes, I do.</p> <p>18 BY MR. POPE:</p> <p>19 Q. How do you know Terry Fisher?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: He -- he is a real estate guy who</p> <p>22 I think Choudhri did business with.</p> <p>23 BY MR. POPE:</p> <p>24 Q. Where did you meet him?</p> <p>25 MR. BALLASES: Objection. Form.</p>

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<p style="text-align: right;">Page 258</p> <p>1 THE DEPONENT: I didn't meet -- I saw him on a 2 Dolcefino video. 3 BY MR. POPE: 4 Q. Oh, you saw him on a Dolcefino video. 5 A. Yes. 6 Q. So you've never met him in person? 7 A. Never met him. 8 Q. Have you ever called him? 9 MR. BALLASES: Objection. Form. 10 THE DEPONENT: No. 11 BY MR. POPE: 12 Q. Have you ever sent him a text? 13 MR. BALLASES: Objection. Form. 14 THE DEPONENT: I don't think so, no. I don't 15 think I called him, either. 16 BY MR. POPE: 17 Q. Have you ever sent him an email? 18 MR. BALLASES: Objection. Form. 19 THE DEPONENT: No. 20 BY MR. POPE: 21 Q. Have you ever provided him with any documents? 22 MR. BALLASES: Objection. Form. 23 THE DEPONENT: No. 24 BY MR. POPE: 25 Q. Have you ever directed a third party to provide</p>	<p style="text-align: right;">Page 260</p> <p>1 BY MR. POPE: 2 Q. Have you ever had Mr. Dolcefino on the line as a 3 third party listening when you've had conversations 4 regarding this case? 5 MR. BALLASES: Objection. Form. 6 THE DEPONENT: No. 7 BY MR. POPE: 8 Q. Have you ever had Mr. Dolcefino on the line for 9 any conversation? 10 A. No. 11 MR. BALLASES: Objection. Form. 12 BY MR. POPE: 13 Q. Have you ever had a three-way call with yourself, 14 Wayne Dolcefino and any third party? 15 MR. BALLASES: Objection. Form. 16 THE DEPONENT: No. 17 BY MR. POPE: 18 Q. And I think you might have covered this, but what 19 year did you first meet Mr. Quinlan? 20 MR. BALLASES: Objection. Form. 21 THE DEPONENT: I think it was maybe just before 22 COVID. 23 BY MR. POPE: 24 Q. And where does Mr. Quinlan live, city, state, 25 country?</p>
<p style="text-align: right;">Page 259</p> <p>1 him with documents? 2 MR. BALLASES: Objection. Form. 3 THE DEPONENT: No. 4 BY MR. POPE: 5 Q. Have you ever directed a third party to send him 6 an email? 7 MR. BALLASES: Objection. Form. 8 THE DEPONENT: No. 9 BY MR. POPE: 10 Q. Have you ever directed a third party to send him 11 a text? 12 MR. BALLASES: Objection. Form. 13 THE DEPONENT: No. 14 BY MR. POPE: 15 Q. Have you ever told anyone that Mr. Choudhri is 16 trying to kill you? 17 MR. BALLASES: Objection. Form. 18 THE DEPONENT: I don't think so. I mean, I hope 19 that's not the case. 20 BY MR. POPE: 21 Q. Have you ever told anyone that there's a murder 22 for hire situation involving yourself and Mr. Choudhri? 23 MR. BALLASES: Objection. Form. 24 THE DEPONENT: I mean, this is ridic -- pretty 25 ridiculous, but no. I hope there isn't.</p>	<p style="text-align: right;">Page 261</p> <p>1 MR. BALLASES: Objection. Form. 2 THE DEPONENT: I don't know. 3 BY MR. POPE: 4 Q. Does he live in the United States? 5 MR. BALLASES: Objection. Form. 6 THE DEPONENT: I think he lives in the United 7 States, yes. 8 BY MR. POPE: 9 Q. Does he live in Puerto Rico? 10 MR. BALLASES: Objection. Form. 11 THE DEPONENT: Possibly. 12 BY MR. POPE: 13 Q. Possibly? Have you ever met with him in Puerto 14 Rico? 15 MR. BALLASES: Objection. Form. 16 THE DEPONENT: No, but I'd like to. 17 BY MR. POPE: 18 Q. Have you ever met with him anywhere other than 19 Houston, Texas? 20 MR. BALLASES: Objection. Form. 21 THE DEPONENT: No. 22 BY MR. POPE: 23 Q. Has he ever been to your office? 24 MR. BALLASES: Objection. Form. 25 THE DEPONENT: I don't think so.</p>

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<p style="text-align: right;">Page 262</p> <p>1 BY MR. POPE:</p> <p>2 Q. Has he ever been to your home?</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 THE DEPONENT: No.</p> <p>5 BY MR. POPE:</p> <p>6 Q. Has he ever been to your parents' home?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE DEPONENT: No.</p> <p>9 BY MR. POPE:</p> <p>10 Q. Has he ever been to the home of anyone who you're</p> <p>11 related to?</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Sisters, brothers?</p> <p>15 A. That I know of?</p> <p>16 Q. That you know of.</p> <p>17 A. No. I don't think so. Unless he knows a bunch</p> <p>18 of Pakistanis that I'm not aware of, no.</p> <p>19 Q. Has Mr. Quinlan ever paid you for anything?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: Not yet.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Not yet. Okay. Do you have any business</p> <p>24 dealings with Mr. Quinlan outside of this case?</p> <p>25 MR. BALLASES: Objection. Form.</p>	<p style="text-align: right;">Page 264</p> <p>1 THE DEPONENT: I'm not aware of that.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Do you know whether or not Mr. Quinlan is in the</p> <p>4 business of buying and selling judgments?</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: I'm not aware of that.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Are you aware of whether or not Mr. Quinlan is in</p> <p>9 any business? Are you aware of what he does for a living?</p> <p>10 A. I -- I think he's in real estate.</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 BY MR. POPE:</p> <p>13 Q. He's in real estate. Commercial or residential?</p> <p>14 A. I believe it's commercial.</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 BY MR. POPE:</p> <p>17 Q. National or international?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: National.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Have you ever picked up Hira Azhar from an</p> <p>22 airport?</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 THE DEPONENT: I don't think so, no.</p> <p>25 BY MR. POPE:</p>
<p style="text-align: right;">Page 263</p> <p>1 THE DEPONENT: No.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Do you and Mr. Quinlan have any other judgments</p> <p>4 where you share ownership interest?</p> <p>5 A. No.</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Do you and Mr. Quinlan have any interest in real</p> <p>9 estate together?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: We do not.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Do you and Mr. Quinlan or any of your entities</p> <p>14 share any interest in real estate?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: We do not.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Are you aware whether or not Mr. Quinlan has any</p> <p>19 entities?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: I -- I'm not even aware of that.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Are you aware of whether or not Mr. Quinlan has</p> <p>24 any other judgments in which he is a judgment creditor?</p> <p>25 MR. BALLASES: Objection. Form.</p>	<p style="text-align: right;">Page 265</p> <p>1 Q. Did you help support her get back to United</p> <p>2 States of America?</p> <p>3 A. Yes, I did.</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 BY MR. POPE:</p> <p>6 Q. And how did you do that?</p> <p>7 A. I mean, I think that's work product and attorney-</p> <p>8 client privilege information. I can't talk about that.</p> <p>9 She's my -- she's my client.</p> <p>10 Q. Did you pay for her to fly here?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: I'm not going to talk about that.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Do you know if she arrived here by plane?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: I mean, I don't think she came</p> <p>17 here by boat.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Where was she coming from?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: I don't -- Pakistan maybe.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Oh, Pakistan. Okay.</p> <p>24 MR. BALLASES: Earth.</p> <p>25 MR. POPE: Could be the moon. We have a new one</p>

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<p style="text-align: right;">Page 266</p> <p>1 that passed -- or well, an asteroid that's out there.</p> <p>2 MR. BALLASES: That's true.</p> <p>3 MR. POPE: She could have been hanging onto it.</p> <p>4 BY MR. POPE:</p> <p>5 Q. When was that? What year was that?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: 2016, maybe, something like that.</p> <p>8 BY MR. POPE:</p> <p>9 Q. And why did you help her come back to United</p> <p>10 States from Pakistan?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: You know, she was in a bad</p> <p>13 situation.</p> <p>14 BY MR. POPE:</p> <p>15 Q. What was that situation?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: She had been sent to Pakistan</p> <p>18 under false pretenses, and her visa had been expired, and</p> <p>19 so she reached out to me for assistance with that.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Did you and Ms. Azhar have a -- are you married</p> <p>22 or single?</p> <p>23 A. I'm married.</p> <p>24 Q. I can see your hand. And do you assert that Ali</p> <p>25 Choudhri is still married to Hira Azhar?</p>	<p style="text-align: right;">Page 268</p> <p>1 not -- that's false.</p> <p>2 BY MR. POPE:</p> <p>3 Q. So you just called him but Wayne Dolcefino was</p> <p>4 not on the line?</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: No. I don't recall, because I've</p> <p>7 -- I have called various people that have been affiliated</p> <p>8 with Ali Choudhri, yes.</p> <p>9 BY MR. POPE:</p> <p>10 Q. And you called them for what?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: To see -- to see what kind of</p> <p>13 fraud he's involved in. I mean, your client's a habitual</p> <p>14 fraudster, so, you know, I have to --</p> <p>15 BY MR. POPE:</p> <p>16 Q. And how many people -- I'm sorry. Go ahead and</p> <p>17 finish.</p> <p>18 A. Yeah. He's a habitual fraudster. So it -- you</p> <p>19 know, I'm an attorney, and I'm going to reach out to people</p> <p>20 that have potential litigation against him.</p> <p>21 Q. For what purpose?</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 THE DEPONENT: To see if there's facts that I can</p> <p>24 gather that will help advance potentially my litigation or</p> <p>25 my client's litigation, or any other general matter</p>
<p style="text-align: right;">Page 267</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: I mean, we talked about this. I</p> <p>3 think he is, personally.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Do you tell other people that?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: I don't really talk about his</p> <p>8 married life to other people.</p> <p>9 BY MR. POPE:</p> <p>10 Q. Have you ever told someone else that?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: I don't think so, no. To you.</p> <p>13 BY MR. POPE:</p> <p>14 Q. Well, today.</p> <p>15 A. Today.</p> <p>16 Q. Isn't it true you called Mr. Terry Fisher about</p> <p>17 Ali Choudhri?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: I don't think so. Maybe I did. I</p> <p>20 don't recall.</p> <p>21 BY MR. POPE:</p> <p>22 Q. And you had Wayne Dolcefino on the line when you</p> <p>23 did that?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: No, that's not true. That's</p>	<p style="text-align: right;">Page 269</p> <p>1 involving him.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Which client in particular?</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: Any -- any client.</p> <p>6 BY MR. POPE:</p> <p>7 Q. Any client?</p> <p>8 A. Any potential client.</p> <p>9 Q. How many clients do you have with claims</p> <p>10 currently pending against Mr. Choudhri?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: Currently pending? I don't know.</p> <p>13 BY MR. POPE:</p> <p>14 Q. So do you solicit clients to file suits against</p> <p>15 Mr. Choudhri?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: No, absolutely not.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Do you solicit clients to file suits against any</p> <p>20 of Mr. Choudhri's entities?</p> <p>21 MR. BALLASES: Objection. Form.</p> <p>22 THE DEPONENT: No, absolutely not.</p> <p>23 BY MR. POPE:</p> <p>24 Q. So your purpose for calling people who may have</p> <p>25 claims against Mr. Choudhri is just for investigative</p>

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<p style="text-align: right;">Page 270</p> <p>1 purposes?</p> <p>2 A. That's right.</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 BY MR. POPE:</p> <p>5 Q. And what have you found in that investigation?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: That he's -- found that he's a</p> <p>8 habitual fraudster. He's a liar. He's a forger. He is</p> <p>9 someone who can't be trusted.</p> <p>10 BY MR. POPE:</p> <p>11 Q. And --</p> <p>12 A. He's someone who will take your money. Doesn't</p> <p>13 matter what situation you're in. Do you want me to go on?</p> <p>14 Q. Which potential person with a claim did you call</p> <p>15 -- who did you call who told you that?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: You know, it's been -- there's</p> <p>18 been so many years of dealing with him that I can't --</p> <p>19 there's -- I can't count the number of people that have</p> <p>20 told me he's ripped them off or that his family's ripped</p> <p>21 them off.</p> <p>22 BY MR. POPE:</p> <p>23 Q. So you can't count the number of people you</p> <p>24 called to talk about Ali Choudhri?</p> <p>25 MR. BALLASES: Objection. Form.</p>	<p style="text-align: right;">Page 272</p> <p>1 BY MR. POPE:</p> <p>2 Q. How do you know Chris Ramey?</p> <p>3 A. He is a litigant against Mr. Choudhri and I think</p> <p>4 other entities related to Mr. Choudhri.</p> <p>5 Q. Are you his counsel in that litigation?</p> <p>6 A. No.</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Are you a party to that litigation?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: I am not.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Are you listed as a witness in that litigation?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 THE DEPONENT: I could be. I don't know.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Has that case already gone to trial?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: Not to my knowledge.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Do you know when it was filed?</p> <p>22 MR. BALLASES: Objection. Form.</p> <p>23 THE DEPONENT: I don't.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Did you know Mr. Ramey before the litigation was</p>
<p style="text-align: right;">Page 271</p> <p>1 THE DEPONENT: That have called me. I don't</p> <p>2 necessarily call people.</p> <p>3 BY MR. POPE:</p> <p>4 Q. How do they find out about you?</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: I don't know. People find</p> <p>7 lawyers.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Well, it's your prior testimony that you actually</p> <p>10 seek out the people who have claims against Mr. Choudhri.</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: No. I said as an investigative</p> <p>13 matter, if there's someone that has a claim against Ali</p> <p>14 Choudhri or a pending litigation, I may pick up the phone</p> <p>15 and call them, which is what lawyers do.</p> <p>16 BY MR. POPE:</p> <p>17 Q. How many times have you done that?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: I -- I -- maybe half a dozen</p> <p>20 times. I'm not sure. It's part of the investigative</p> <p>21 process of any attorney.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Do you know Chris Ramey?</p> <p>24 MR. BALLASES: Objection. Form.</p> <p>25 THE DEPONENT: Yes, I do.</p>	<p style="text-align: right;">Page 273</p> <p>1 filed?</p> <p>2 MR. BALLASES: Objection. Form.</p> <p>3 THE DEPONENT: I did not know him before that.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Did he call you, or did you call him?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: I think he called me.</p> <p>8 BY MR. POPE:</p> <p>9 Q. And how did he find out about you?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: People find out about me.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Do you run any ads to let people know that you're</p> <p>14 out here pursuing claims against Ali Choudhri?</p> <p>15 MR. BALLASES: Objection. Form.</p> <p>16 THE DEPONENT: I don't, no.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Is it just known in the community that you pursue</p> <p>19 claims against Ali Choudhri?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: I don't know that.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Are there any listservs that you're a part of</p> <p>24 that talk about Ali Choudhri or any of his entities?</p> <p>25 MR. BALLASES: Objection. Form.</p>

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<p style="text-align: right;">Page 274</p> <p>1 THE DEPONENT: Not that I'm aware of.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Any podcasts or social media platforms where you</p> <p>4 discuss Ali Choudhri or any of his entities?</p> <p>5 A. No.</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Do you have a social media page personally?</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 THE DEPONENT: Sure.</p> <p>11 BY MR. POPE:</p> <p>12 Q. Do you talk about Ali Choudhri on your social</p> <p>13 media page?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 THE DEPONENT: No, never do that.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Any of his entities?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: No.</p> <p>20 BY MR. POPE:</p> <p>21 Q. Do you keep a social media -- which social media</p> <p>22 platform do you have or do you utilize?</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 THE DEPONENT: Facebook.</p> <p>25 BY MR. POPE:</p>	<p style="text-align: right;">Page 276</p> <p>1 A. Just my law office.</p> <p>2 Q. Just your law office. Do you have any articles</p> <p>3 that reference Mr. Choudhri on your law practice social</p> <p>4 media page?</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 THE DEPONENT: I do not.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Do you have any articles that reference</p> <p>9 Mr. Choudhri on your law firm's web page?</p> <p>10 MR. BALLASES: Objection. Form.</p> <p>11 THE DEPONENT: No, I do not.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Do you write any blogs about Mr. Choudhri?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 THE DEPONENT: No, I do not.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Have you written any blogs in the past -- I'm</p> <p>18 sorry. Have you written any blogs in the past?</p> <p>19 MR. BALLASES: Objection. Form.</p> <p>20 THE DEPONENT: I wouldn't waste my time doing</p> <p>21 that.</p> <p>22 BY MR. POPE:</p> <p>23 Q. Have you written -- made any posts or written any</p> <p>24 blogs on either the social media or the website regarding</p> <p>25 any of the named defendants?</p>
<p style="text-align: right;">Page 275</p> <p>1 Q. No Instagram?</p> <p>2 A. I mean, I think I use Instagram, too.</p> <p>3 Q. TikTok?</p> <p>4 A. No.</p> <p>5 MR. BALLASES: Objection. Form.</p> <p>6 BY MR. POPE:</p> <p>7 Q. LinkedIn?</p> <p>8 A. LinkedIn, yes.</p> <p>9 Q. LinkedIn. Snapchat?</p> <p>10 A. No.</p> <p>11 Q. Locket?</p> <p>12 MR. BALLASES: Objection. Form.</p> <p>13 THE DEPONENT: I don't even know what that is.</p> <p>14 BY MR. POPE:</p> <p>15 Q. And do you talk about Mr. Choudhri or any of his</p> <p>16 entities on any of those platforms mentioned?</p> <p>17 MR. BALLASES: Objection. Form.</p> <p>18 THE DEPONENT: No, I do not.</p> <p>19 BY MR. POPE:</p> <p>20 Q. Do you keep a social media platform for any of</p> <p>21 your business entities?</p> <p>22 A. Yes, I do.</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 BY MR. POPE:</p> <p>25 Q. Which ones?</p>	<p style="text-align: right;">Page 277</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 THE DEPONENT: No.</p> <p>3 BY MR. POPE:</p> <p>4 Q. Are you aware of any police reports made against</p> <p>5 Ali Choudhri?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: Not that I'm aware of.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Are you aware of a murder for hire plot or ploy</p> <p>10 that involves Quanell X and Osama Abdullatif?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: I think I heard, yeah, some</p> <p>13 nonsense about that.</p> <p>14 BY MR. POPE:</p> <p>15 Q. And what did you hear?</p> <p>16 A. That Quanell said that Osama wanted to kill Ali</p> <p>17 or something stupid like that.</p> <p>18 Q. And where did you hear that?</p> <p>19 MR. BALLASES: Objection. Form.</p> <p>20 THE DEPONENT: I think it was in court. In court</p> <p>21 maybe, in court. I was at the court hearing.</p> <p>22 BY MR. POPE:</p> <p>23 Q. At the court hearing?</p> <p>24 A. Some silly stuff.</p> <p>25 Q. The same court hearing with -- before Judge</p>

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<p style="text-align: right;">Page 278</p> <p>1 Manor?</p> <p>2 A. Yes.</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 BY MR. POPE:</p> <p>5 Q. Where you were representing Chris Wyatt and</p> <p>6 Azeemeh Zaheer?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 THE DEPONENT: Yes.</p> <p>9 BY MR. POPE:</p> <p>10 Q. And you heard that from whom that day?</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 THE DEPONENT: I think Quantell testified to</p> <p>13 that.</p> <p>14 MR. POPE: Mr. Perkins wants you back there.</p> <p>15 MR. LEYH: Do they like lock them at 6:00 and we</p> <p>16 can't get out?</p> <p>17 MR. POPE: You can get out, but if you go out,</p> <p>18 you can't get back in.</p> <p>19 MR. LEYH: Got it.</p> <p>20 BY MR. POPE:</p> <p>21 Q. In the divorce case, were you the lawyer between</p> <p>22 Hira Azhar and Ali Choudhri? Did you also sue Texas REIT</p> <p>23 in that case?</p> <p>24 A. I don't know.</p> <p>25 MR. BALLASES: Objection. Form.</p>	<p style="text-align: right;">Page 280</p> <p>1 BY MR. POPE:</p> <p>2 Q. Based on what?</p> <p>3 A. Based on people filing claims that are -- I mean,</p> <p>4 she's involved in the shenanigans, right?</p> <p>5 Q. She's involved in his divorce?</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 THE DEPONENT: She's involved in hiding assets</p> <p>8 for him, so if she were to -- and I don't know if she was</p> <p>9 sued or not, but if she was, I'm sure there was a real</p> <p>10 reason for it.</p> <p>11 BY MR. POPE:</p> <p>12 Q. You said you were not lead counsel. Who was lead</p> <p>13 counsel in that case?</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 THE DEPONENT: Bobby Newman.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Did you move to recuse the judge in that case?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: I wasn't -- I was not lead</p> <p>20 counsel.</p> <p>21 BY MR. POPE:</p> <p>22 Q. Did you file any motions in that case?</p> <p>23 MR. BALLASES: Objection. Form.</p> <p>24 THE DEPONENT: I didn't file anything, no.</p> <p>25 BY MR. POPE:</p>
<p style="text-align: right;">Page 279</p> <p>1 BY MR. POPE:</p> <p>2 Q. Did you sue any other parties in that case?</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 THE DEPONENT: I have no idea.</p> <p>5 BY MR. POPE:</p> <p>6 Q. You have no idea who you sued in the case?</p> <p>7 MR. BALLASES: Objection. Form.</p> <p>8 BY MR. POPE:</p> <p>9 Q. Did you assume --</p> <p>10 A. I was not lead counsel.</p> <p>11 Q. You weren't lead counsel. But you were a lawyer</p> <p>12 on the case, correct?</p> <p>13 A. Sure.</p> <p>14 MR. BALLASES: Objection. Form.</p> <p>15 BY MR. POPE:</p> <p>16 Q. Did you also -- was Ms. Shahnaz Choudhri also</p> <p>17 sued in that case?</p> <p>18 MR. BALLASES: Objection. Form.</p> <p>19 THE DEPONENT: I don't know, maybe. If she was,</p> <p>20 she should have been.</p> <p>21 BY MR. POPE:</p> <p>22 Q. If she was?</p> <p>23 A. If she was, it would have been appropriate to do</p> <p>24 it.</p> <p>25 MR. BALLASES: Objection. Form.</p>	<p style="text-align: right;">Page 281</p> <p>1 Q. Did you go to court in that case?</p> <p>2 A. I did.</p> <p>3 MR. BALLASES: Objection. Form.</p> <p>4 BY MR. POPE:</p> <p>5 Q. You attended hearings in that case?</p> <p>6 A. Yes.</p> <p>7 Q. Did you see Mr. Wyatt come to court in that</p> <p>8 hearing or any of those proceedings with Mr. Choudhri?</p> <p>9 MR. BALLASES: Objection. Form.</p> <p>10 THE DEPONENT: Never saw him once, no.</p> <p>11 BY MR. POPE:</p> <p>12 Q. You never saw him once in that proceeding?</p> <p>13 A. Mm-mm.</p> <p>14 Q. How many judgments have you purchased that are</p> <p>15 related to Ali Choudhri?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: I think two.</p> <p>18 BY MR. POPE:</p> <p>19 Q. Just two?</p> <p>20 A. Yes.</p> <p>21 Q. How many judgments have you purchased that are</p> <p>22 related to any of Mr. Choudhri's entities?</p> <p>23 A. The same two.</p> <p>24 Q. How many judgments have you purchased that are</p> <p>25 related to Shahnaz Choudhri?</p>

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1 A. None.

2 **Q. Or her entities?**

3 THE REPORTER: I'm sorry. What was that?

4 THE DEPONENT: I don't think she has any.

5 BY MR. POPE:

6 **Q. Have you ever bought any judgments other than the**

7 **ones, the two that you have brought that involve**

8 **Mr. Choudhri?**

9 A. No.

10 **Q. Why did you buy these judgments?**

11 MR. BALLASES: Objection. Form.

12 THE DEPONENT: Why not?

13 BY MR. POPE:

14 **Q. I don't know.**

15 A. I mean, there is a judgment that's owed. I can

16 buy a judgment from anybody I want, against anybody I want

17 to.

18 **Q. I think your prior testimony was that for years,**

19 **you have a hard time collecting money from Mr. Choudhri, so**

20 **why would you buy judgments knowing going into it that you**

21 **think they'd be hard to collect?**

22 MR. BALLASES: Objection. Form.

23 THE DEPONENT: Well, they're final judgments and,

24 you know, I didn't think that -- they shouldn't be hard to

25 collect because I know he's hiding money.

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1 BY MR. POPE:

2 **Q. Is maybe one of them -- is one of the judgments**

3 **on appeal?**

4 MR. BALLASES: Objection. Form.

5 THE DEPONENT: I didn't buy that one.

6 BY MR. POPE:

7 **Q. You didn't buy that one. But you're aware it's**

8 **on appeal?**

9 MR. BALLASES: Objection. Form.

10 THE DEPONENT: I don't know if it's on appeal.

11 If you say so.

12 BY MR. POPE:

13 **Q. So you didn't investigate that one?**

14 MR. BALLASES: Objection. Form.

15 BY MR. POPE:

16 **Q. Did you investigate that one? Did you**

17 **investigate that case?**

18 MR. BALLASES: Objection. Form.

19 BY MR. POPE:

20 **Q. Did you do any investigation on that judgment?**

21 A. I did not.

22 **Q. You did not?**

23 A. No.

24 **Q. Did you research or review that case like you**

25 **reviewed the others?**

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1 MR. BALLASES: Objection. Form.

2 THE DEPONENT: A little bit, not -- not a whole

3 lot. Yeah.

4 BY MR. POPE:

5 **Q. Do you know Cory Saddlejack?**

6 MR. BALLASES: Objection. Form.

7 THE DEPONENT: No, but I'm going to look him up

8 after this.

9 BY MR. POPE:

10 **Q. So you're not aware that he's Chris Wyatt's**

11 **nephew?**

12 MR. BALLASES: Objection. Form.

13 THE DEPONENT: No.

14 BY MR. POPE:

15 **Q. Do you believe Quanell X to be an honest person?**

16 MR. BALLASES: Objection. Form.

17 THE DEPONENT: What kind of question is that?

18 You're going to go back and tell Quanell what I said?

19 BY MR. POPE:

20 **Q. Do you believe Quanell X to be an honest person?**

21 MR. BALLASES: Objection. Form.

22 THE DEPONENT: I believe he's honest, but not to

23 the extent he said anything about Osama Abdullatif.

24 BY MR. POPE:

25 **Q. So when he testified about the murder for hire**

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1 **plot that involved Mr. Abdullatif, you felt he was not**

2 **being honest?**

3 MR. BALLASES: Objection. Form.

4 THE DEPONENT: I mean, you're going to have to

5 ask him about that.

6 BY MR. POPE:

7 **Q. But in your opinion, was he being honest or not?**

8 A. No.

9 MR. BALLASES: Objection. Form.

10 BY MR. POPE:

11 **Q. In your opinion, he was lying?**

12 MR. BALLASES: Objection. Form.

13 THE DEPONENT: I don't -- I don't know.

14 BY MR. POPE:

15 **Q. Do you know R.J. Shannon?**

16 MR. BALLASES: Objection. Form.

17 THE DEPONENT: No, but I'm going to look him up,

18 too.

19 BY MR. POPE:

20 **Q. So you've never met R.J. Shannon?**

21 MR. BALLASES: Objection. Form. He just said he

22 didn't know him.

23 MR. POPE: You said he just said what?

24 MR. BALLASES: He just said he didn't know him,

25 so how could he meet him if he doesn't know him?

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<p style="text-align: right;">Page 286</p> <p>1 MR. POPE: I don't know.</p> <p>2 BY MR. POPE:</p> <p>3 Q. What's your familiarity with TransAct Title?</p> <p>4 MR. BALLASES: Objection. Form.</p> <p>5 THE DEPONENT: I know they're a title company,</p> <p>6 and Mansoor Chaudhry owns them.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Do you have any ownership interest in that title</p> <p>9 company?</p> <p>10 A. No.</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Have you closed transactions for that title</p> <p>14 company?</p> <p>15 A. I have.</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 BY MR. POPE:</p> <p>18 Q. Which ones?</p> <p>19 MR. BALLASES: Objection. Form.</p> <p>20 THE DEPONENT: Business transactions. Why is --</p> <p>21 how is that relevant?</p> <p>22 BY MR. POPE:</p> <p>23 Q. Any transactions that involved any of Ali</p> <p>24 Choudhri's properties?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 288</p> <p>1 MR. BALLASES: He -- you don't need the account</p> <p>2 information for a nonparty.</p> <p>3 MR. POPE: I didn't ask for it. I just said if</p> <p>4 it --</p> <p>5 BY MR. POPE:</p> <p>6 Q. Who has an ownership in that entity?</p> <p>7 A. Just me.</p> <p>8 Q. Just you. Did anyone else ever have an ownership</p> <p>9 interest in it?</p> <p>10 A. I think we talked about this already.</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Was that one with your parents?</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. Did you buy them out?</p> <p>16 MR. BALLASES: Objection. Form.</p> <p>17 THE DEPONENT: I think so, yes.</p> <p>18 BY MR. POPE:</p> <p>19 Q. When did you buy them out?</p> <p>20 MR. BALLASES: Objection. Form.</p> <p>21 THE DEPONENT: Years ago.</p> <p>22 MR. POPE: We're hitting 6 o'clock, so --</p> <p>23 THE DEPONENT: Hey, I'm ready to continue, so I'd</p> <p>24 like to get the Court involved if we need to finish up</p> <p>25 today. I'm not coming back tomorrow, so we need to finish</p>
<p style="text-align: right;">Page 287</p> <p>1 MR. BALLASES: Objection. Form.</p> <p>2 BY MR. POPE:</p> <p>3 Q. Any transactions that involved any properties</p> <p>4 owned by any of the named defendants?</p> <p>5 A. None.</p> <p>6 MR. BALLASES: Objection. Form.</p> <p>7 BY MR. POPE:</p> <p>8 Q. Do you maintain books and records for Khawaja</p> <p>9 Partners, Limited?</p> <p>10 A. Yes.</p> <p>11 MR. BALLASES: Objection. Form.</p> <p>12 BY MR. POPE:</p> <p>13 Q. Is there a bank account for those?</p> <p>14 MR. BALLASES: Objection. Form. You don't need</p> <p>15 to answer that.</p> <p>16 BY MR. POPE:</p> <p>17 Q. Who are the other -- are you not -- is your</p> <p>18 lawyer instructing you not to answer?</p> <p>19 MR. BALLASES: So that's misleading, harassing,</p> <p>20 and oppressive. You don't -- I don't know why you're</p> <p>21 asking for bank account information for my client. You</p> <p>22 don't need it -- he's not even a party to this matter. So</p> <p>23 yeah, I'm instructing him not to answer.</p> <p>24 MR. POPE: The main question was just did one</p> <p>25 exist. I didn't ask for the account information.</p>	<p style="text-align: right;">Page 289</p> <p>1 up today.</p> <p>2 MR. POPE: We need to finish.</p> <p>3 THE REPORTER: We are at four hours and 51</p> <p>4 minutes on the record.</p> <p>5 MR. BALLASES: James, I mean, how much longer do</p> <p>6 you have with this witness? Do you have any idea?</p> <p>7 THE REPORTER: Do we want to go off the record</p> <p>8 before discussing --</p> <p>9 MR. POPE: Yes. Yes.</p> <p>10 THE VIDEOGRAPHER: All parties agree to going off</p> <p>11 the record?</p> <p>12 MR. POPE: Yes.</p> <p>13 THE VIDEOGRAPHER: We're going off the record at</p> <p>14 6:00 p.m.</p> <p>15 (WHEREUPON, a recess was taken.)</p> <p>16 THE VIDEOGRAPHER: We're going on record. It's</p> <p>17 6:01 p.m.</p> <p>18 MR. BALLASES: This is Michael Ballases, counsel</p> <p>19 for the plaintiffs in this adversary proceeding. Mr. Pope</p> <p>20 has indicated it's about 6 o'clock now. It's 6:02 and he's</p> <p>21 indicated he wants to stop for the day. We are willing to</p> <p>22 continue, but he's got two days pursuant to the court</p> <p>23 order, so we will be back tomorrow. But the record needs</p> <p>24 to be clear that we're willing to continue today to allow</p> <p>25 these depositions to reach their conclusion.</p>

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1 MR. POPE: And this is James Pope, and we are
2 going to continue in the morning with Mr. Khawaja starting
3 at 10:00 a.m., unless the parties can agree to start a
4 little earlier.
5 MR. BALLASES: Okay. We'll keep it at 10:00.
6 MR. POPE: Want to keep it at 10:00?
7 MR. BALLASES: Keep it at 10:00.
8 MR. POPE: Okay. So we're going to Zoom tomorrow
9 with Omar Khawaja at 10:00 a.m. We're not passing. We'll
10 resume tomorrow.
11 THE REPORTER: Okay. And for this section of the
12 transcript, Mr. Pope, would you like to order a copy?
13 MR. POPE: Yes. Bill to the client.
14 THE REPORTER: Okay. And Mr. Ballases, would you
15 like to order a copy?
16 MR. BALLASES: Yeah. Do you not want to wait
17 till the end, or you're not going to be here?
18 THE REPORTER: I won't be here tomorrow.
19 MR. BALLASES: Then yes.
20 THE REPORTER: So you'll have this section, and
21 then we'll have a continuation.
22 MR. BALLASES: Yes. We do, please.
23 THE REPORTER: I have that noted.
24 Ms. MacGeorge, do you want a copy of the
25 transcript, ma'am?

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1 MS. MACGEORGE: We are all one and the same. So
2 just one for the other side.
3 THE REPORTER: Let's go off the record.
4 THE VIDEOGRAPHER: This concludes the deposition
5 of Omar Khawaja. We're going off the record at 6:03 p.m.
6 (WHEREUPON, a recess was taken.)
7 THE REPORTER: We are on the record. The time is
8 6:04 p.m.
9 MR. POPE: This is James Pope coming back on the
10 record just to say we are resuming tomorrow. We're
11 resuming at 9:00 a.m.?
12 MR. BELLASES: That's correct.
13 MR. QUINLAN: I thought John said 8:00.
14 MR. BELLASES: We agreed to 9:00. I got to take
15 my kid to school. I can't be here that early.
16 MR. POPE: So we're going to start tomorrow at
17 9:00 a.m., resuming with Omar Khawaja. And the next in
18 line will be John Quinlan.
19 MR. QUINLAN: Thank you.
20 MR. POPE: And then ending with Osama Abdullatif.
21 THE REPORTER: I have all of that noted. We are
22 off the record at 6:05 p.m.
23 (WHEREUPON, the deposition of Omar Khawaja was
24 concluded at 6:05 p.m.)
25

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CERTIFICATE

1
2
3 I, Barbara Molina, do hereby certify that I reported
4 all proceedings adduced in the foregoing matter and that
5 the foregoing transcript pages constitutes a full, true
6 and accurate record of said proceedings to the best of my
7 ability.
8
9 I further certify that I am neither related to counsel
10 or any party to the proceedings nor have any interest in
11 the outcome of the proceedings.
12
13 IN WITNESS WHEREOF, I have hereunto set my hand this
14 6th day of October, 2024.
15
16
17 
18
19 Barbara Molina
20
21
22
23
24
25

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CORRECTION SHEET

1 Deposition of: Omar Khawaja Date: 20-03-24
2 Regarding: Quinlan vs. Jetall Companiess
3 Reporter: Molina/Perkins/George/Hirth/Raposa/Sullivan
4
5
6 Please make all corrections, changes or clarifications
7 to your testimony on this sheet, showing page and line
8 number. If there are no changes, write "none" across
9 the page. Sign this sheet and the line provided.
10 Page Line Reason for Change
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
18 _____
19 _____
20 _____
21 _____
22 _____
23 Signature: _____
24 Omar Khawaja
25

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<div style="text-align: right; font-size: small;">Page 294</div> <div style="text-align: center; font-weight: bold; font-size: small;">DECLARATION</div> <div style="font-family: monospace; font-size: small;">1 2 Deposition of: Omar Khawaja Date: 3 Regarding: JOHN QUINLAN vs JETALL COMPANIES 4 Reporter: 5 _____ 6 7 I declare under penalty of perjury the following to be 8 true: 9 10 I have read my deposition and the same is true and 11 accurate save and except for any corrections as made 12 by me on the Correction Sheet herein. 13 14 Signed at _____, _____ 15 on the _____ day of _____, 20____. 16 17 18 19 20 21 22 23 24 Signature: _____ 25 Omar Khawaja</div>	

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